UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
CLEVELAND OFFICE
25089 CENTER RIDGE ROAD
WESTLAKE, OH 44145-4170

July 11, 2011

MEMORANDUM

SUBJECT: PCB Sampling Inspection, United Oil Recovery Services, Inc., Middletown, Ohio

FROM: Paul J. Novak, Jr., Geologist

THRU: Mark E. Conti, Team Leader
Cleveland Office (ME-W)

TO: David Star, Chemical Management Branch/Toxics Compliance Section, (LC-8J)

On May 24, 2011, Mike Mikulka, LCD and I performed a PCB Sampling Inspection at United Oil Recovery Services, Inc., in Middletown, Ohio. This inspection was conducted in response to a request from your office to conduct an inspection at this facility. Attached is a report of my findings from the inspection. If you have any questions regarding this report, please contact me.

Attachments

CONCURRENCES								
SYMBOL	CO CHECKRS	MEC						
SURNAME	Pjn-k	Conti						
DATE	7-11-11	7-11-11						

REPORT ON INSPECTION TO DETERMINE

COMPLIANCE WITH PCB REGULATIONS

United Oil Recovery Services Inc.
Middletown, Ohio
May 24, 2011

PERFORMED BY:

U.S. ENVIRONMENTAL PROTECTION AGENCY
Cleveland Office
25089 Center Ridge Road
Westlake, Ohio 44145

PCB COMPLIANCE INSPECTION REPORT

I. OBJECTIVES

The inspection was conducted to document facility compliance or non-compliance with TSCA Section 6 and the PCB regulations found at 40 CFR part 761, by United Oil Recovery Services, Inc., Middletown, Ohio facility.

II. COMPANY IDENTIFICATION

United Oil Recovery Services
2640 Lefferson Road
Middletown, Ohio 45044

Responsible Official

Dave Brown, Chief Operating Officer

III. DATE OF INSPECTION

May 24, 2011

IV. PARTICIPANTS

Company

Jay Black, Plant Manager
David Weber, Environmental Compliance Manager

U.S. EPA

Paul J. Novak, Jr., Geologist
Michael Mikulka, Environmental Engineer

V. COMPANY BACKGROUND [] PCBs [X] No PCBs discovered

The facility handles used oil for recovery purposes. It hauls from its own customers and receives used oil from haulers. We observed that United Oil's own trucks are off-loaded into a tank with a screen on it (to remove larger particles). See photographs in Attachment 2. A process diagram is in Attachment 6. A sample is collected from each truckload and held and later analyzed if required. Subcontractors (those firms that have

their own customers that they collect used oil from) are directed to put the contents of their trucks into frac tanks along the south edge of the property. At the time of our inspection there were eight frac tanks on the property, with seven of these available for use by the subcontractors. Furthermore, one of the seven tanks was locked out for use by the subcontractors because it contained used oil with a value of 33 ppm of PCBs. Attachment 7 contains an analysis sheet supplied to us by Mr. Weber, of the frac tank and the R. S. Used Oil, Inc. load that contaminated the frac tank.

On July 8, 2011, I spoke with Mr. Bill Kennedy of R. S. Used Oil, and he told me that they were unsure of the exact source of the PCBs that they received. They know that it came into their Dayton facility (1708 Farr Drive, Dayton, Ohio) sometime in February of 2011. They also know that the source was over 500 ppm PCB. He also said that they have hired contractors to assist them with the clean-up of the Dayton facility and investigation into the source. Mr. Kennedy finally told me that his firm has submitted documents and notification to U. S. EPA Region 5.

According to Mr. Weber, the facility does a profile on each customer when they become a United Oil Recovery Services customer. At that time, and every two years thereafter United Oil Recovery Services collects and analyses a sample. No other used oil analyses are made between, unless the customer informs United Oil Recovery Services that a change has been made in their process. They rely on that profile to give them the knowledge of what they are receiving from each customer.

The facility separates the used oil from the water fraction and discharges treated waste water to the City of Middletown Waste Water Treatment plant. The facility's industrial user permit (see Attachment 8) has local limits for metals and categorical limits for metals and organics for centralized waste treatment facilities (40 CFR part 437, subpart B). There are no monitoring requirements for PCBs in the Industrial User Permit.

We collected samples at the incoming oil pit (S04), both outbound oil holding tanks (Tanks 211 (S01) and 212 (S02)), and the discharge to the City of Middletown Waste Water Treatment plant ahead of the point where leachate from landfills is received (S03). The samples were delivered to Region 5's Central Regional Laboratory (CRL) for analysis. No PCBs were found by CRL in any of the samples. Attachment 9 contains the CRL data sheets.

A. Opening Conference

We met with on-site officials as indicated in Section II, presented TSCA Inspection Credentials, explained the purpose of the inspection, and presented for signature the TSCA inspection forms as indicated below:

[x] Notice of Inspection
[x] TSCA Confidentiality Notice

These documents were signed by David Weber, Environmental Compliance Manager, and are enclosed as Attachments 3 and 4.

B. Circumstances Applicable to this Inspection

[X] Disposal [ ] Processing
[X] Marking [ ] Distribution
[ ] Storage [] Authorizations
[ ] Manufacturing [X] Recordkeeping
[ ] None of the Above

C. Citation

[x] Not Applicable
[ ] Citation issued on / /
[ ] Response received on / /

D. Closing Conference

[x] I explained the possible outcomes of the inspection and informed the company officials that a final determination and notification would be made by the Regional Office. U. S. EPA form 7740-1, (TSCA Receipt for Samples and Documents) was presented and signed by Mr. Weber for samples and documents collected during the inspection and can be found in Attachment 5.

VII. SAMPLES/ PHOTOGRAPHS/ DOCUMENTS

[ ] None taken

[x] See attachments as listed

VIII. ATTACHMENTS

1. Location map

2. Photographs

3. Notice of Inspection form

4. TSCA Inspection Confidentiality Notice form

5. Receipt for Samples and Documents form

6. Process Schematic

7. Analysis Sheets for Frac Tank

8. Industrial User Permit

9. CRL Analysis sheets

10. ICDS Form

IX. INSPECTOR'S FINDINGS

A. Use and Authorizations

1. Electrical Equipment

a. Transformers

The facility has no transformers of its own on site.

b. Capacitors

There were no regulated capacitors present at the facility at the time of the inspection.

c. Other Electrical Equipment

There was no other oil-filled electrical equipment at the time of the inspection.

2. Hydraulic Equipment

There was no PCB hydraulic equipment present at the facility at the time of the inspection.

3. Heat Transfer Systems

There were no PCB heat transfer systems present at the facility at the time of the inspection.

B. Storage

The facility was holding a frac tank on-site that contained oil that had approximately 33 ppm of PCB oil in it. Facility officials told us that the oil was received from R. S. Used Oil, Inc.

C. Disposal

The facility has not disposed of any PCB articles in the past year. According to Mr. Weber, United Oil Recovery Services is negotiating with R. S. Used Oil for disposal of the material in frac tank that they contaminated.

D. Spills

There were no recorded spills.

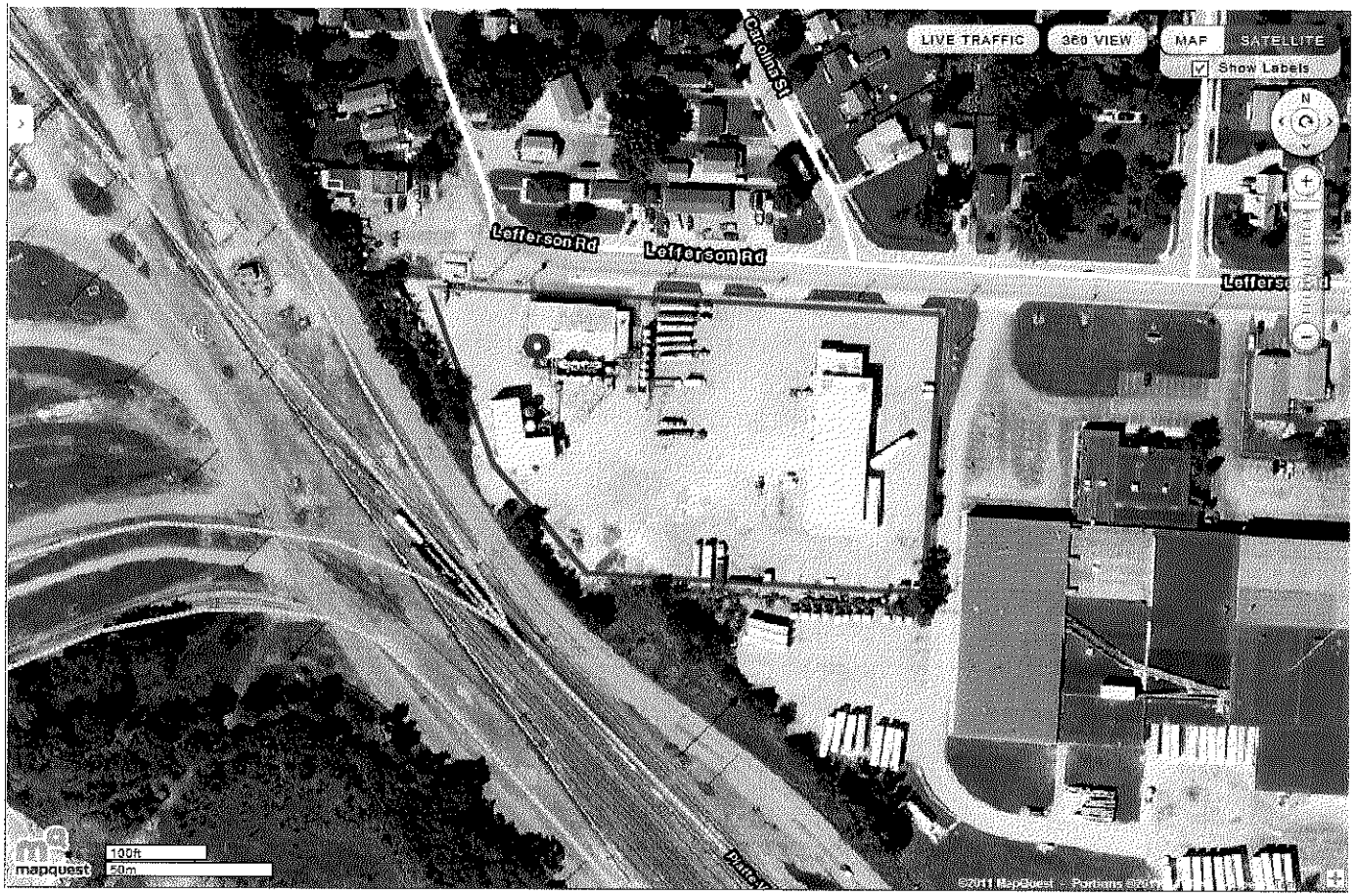
E. Recordkeeping

The facility does not maintain an annual log.

F. Marking

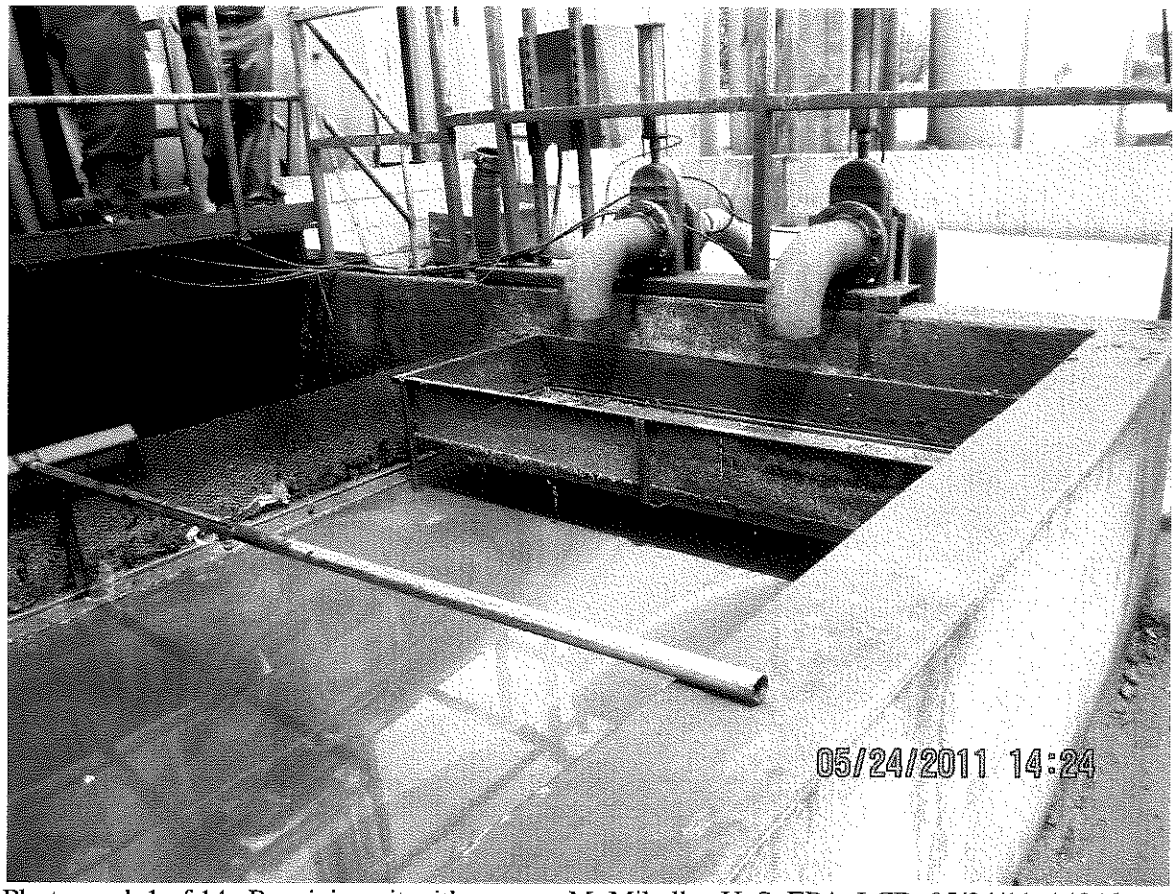
The frac tank on site that contained oil with 33 ppm PCBs was not marked. It was locked out at all inlets and oulets.

ATTACHMENT 1

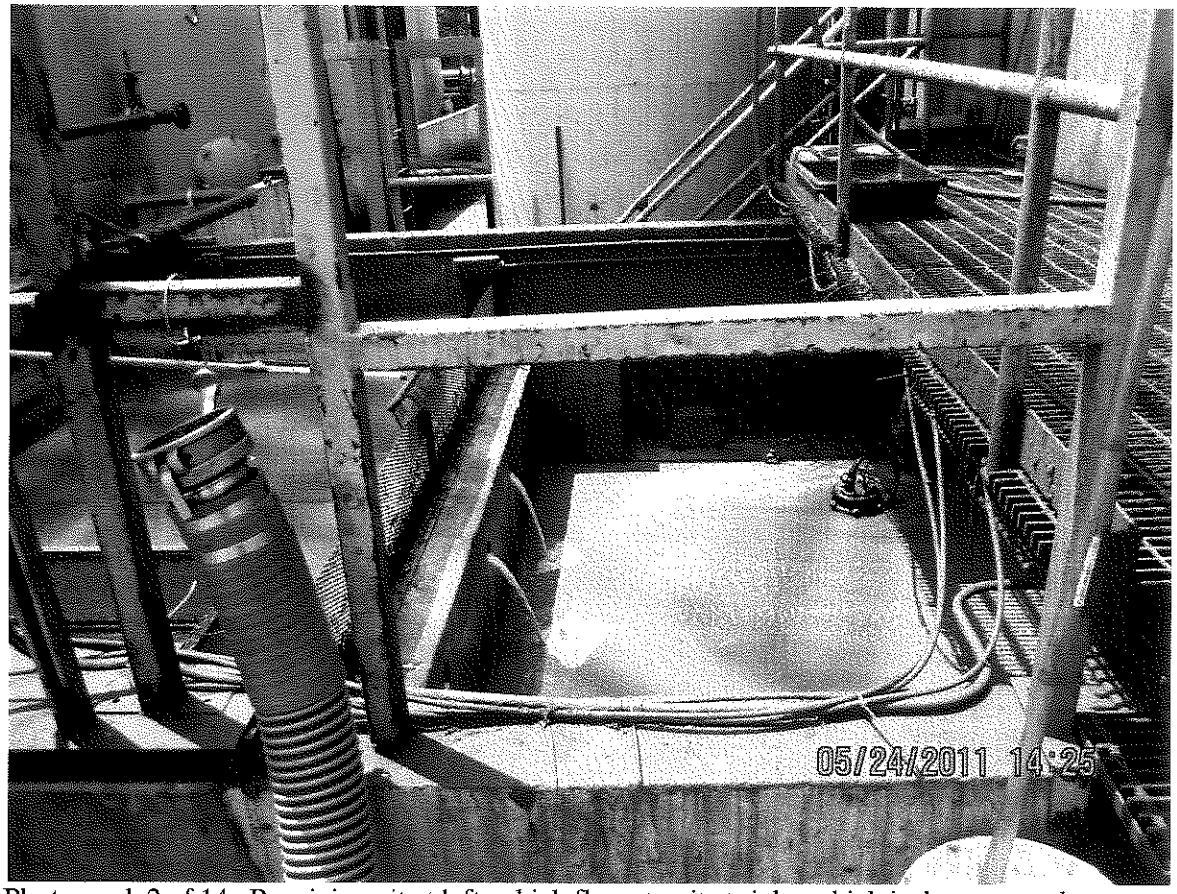


United Oil Recovery Services, 2640 Lefferson Road, Middletown, OH

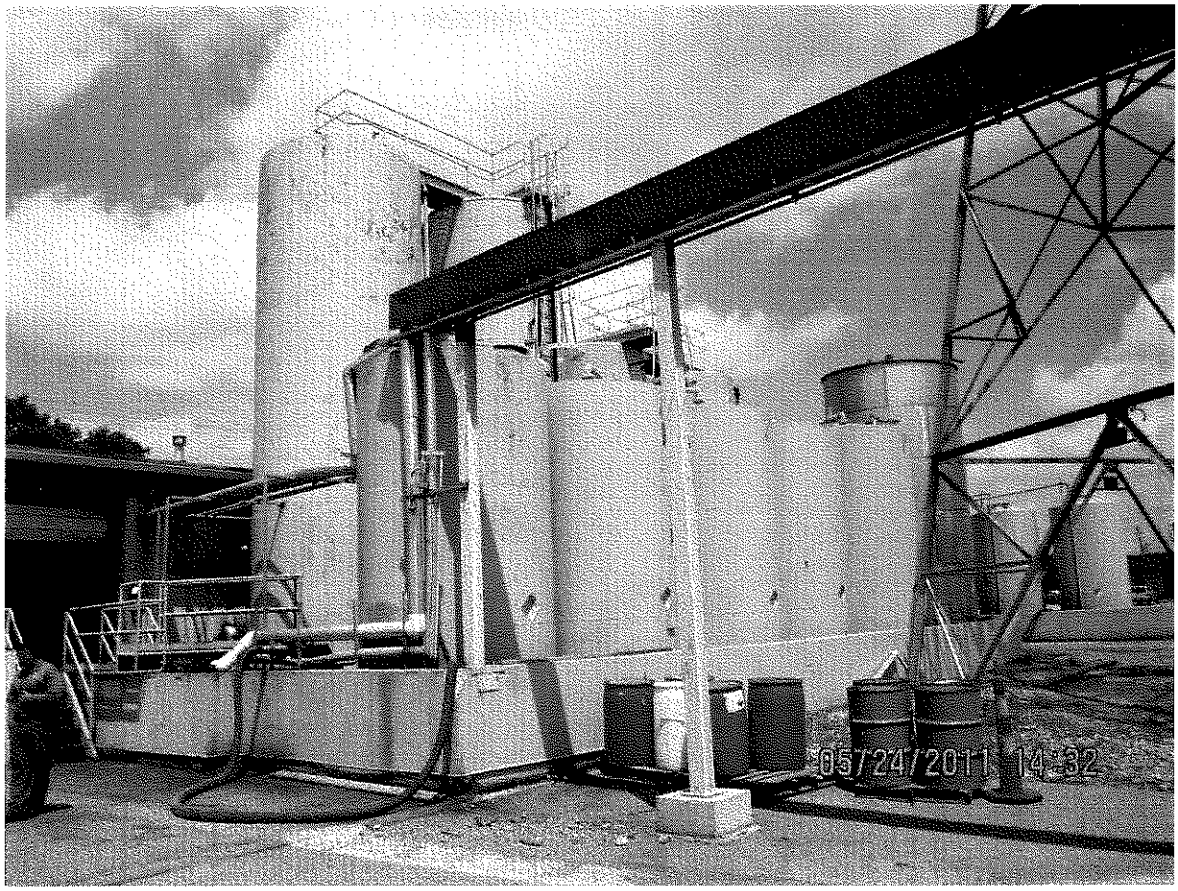
ATTACHMENT 2



Photograph 1 of 14. Receiving pit with screen. M. Mikulka, U. S. EPA, LCD, 05/24/11, 1424 hrs, Cannon SD1400IS, Ser. No., 212065043412, digital media.



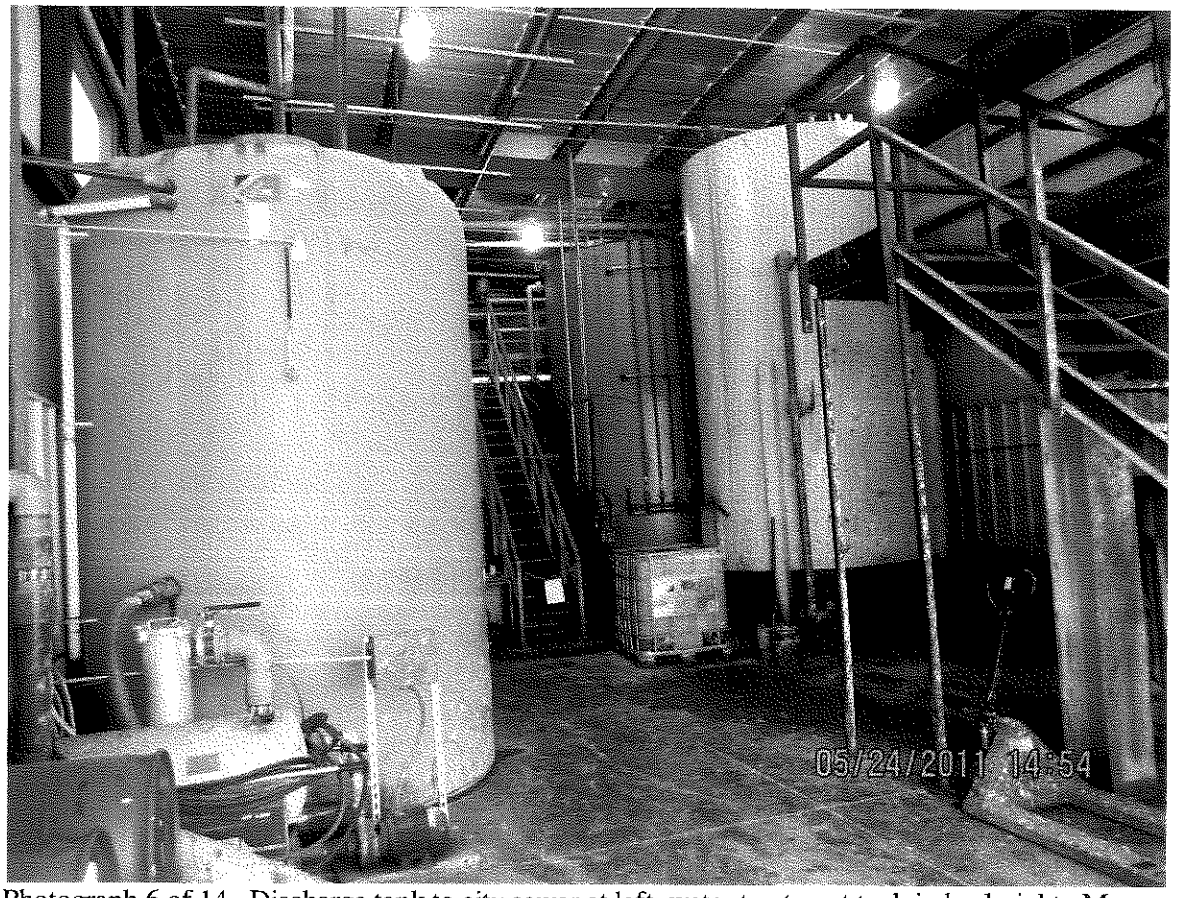
Photograph 2 of 14. Receiving pit at left, which flows to pit at right, which is then pumped to holding tanks? M. Mikulka, U. S. EPA, LCD, 05/24/11, 1425 hrs, Cannon SD1400IS, Ser. No., 212065043412, digital media.



Photograph 3 of 14. Holding tanks for oil to be processed. M. Mikulka, U. S. EPA, LCD, 05/24/11, 1432 hrs, Cannon SD1400IS, Ser. No., 212065043412, digital media.

Photograph 4 of 14. Flow meter (on floor by pipe) for discharge to city sewer. pH meter recorder on wall. M. Mikulka, U. S. EPA, LCD, 05/24/11, 1445 hrs, Cannon SD1400IS, Ser. No., 212065043412, digital media.

Photograph 5 of 14. Filter press (on top) and dumpster for filter cake. M. Mikulka, U. S. EPA, LCD, 05/24/11, 1454 hrs, Cannon SD1400IS, Ser. No., 212065043412, digital media.

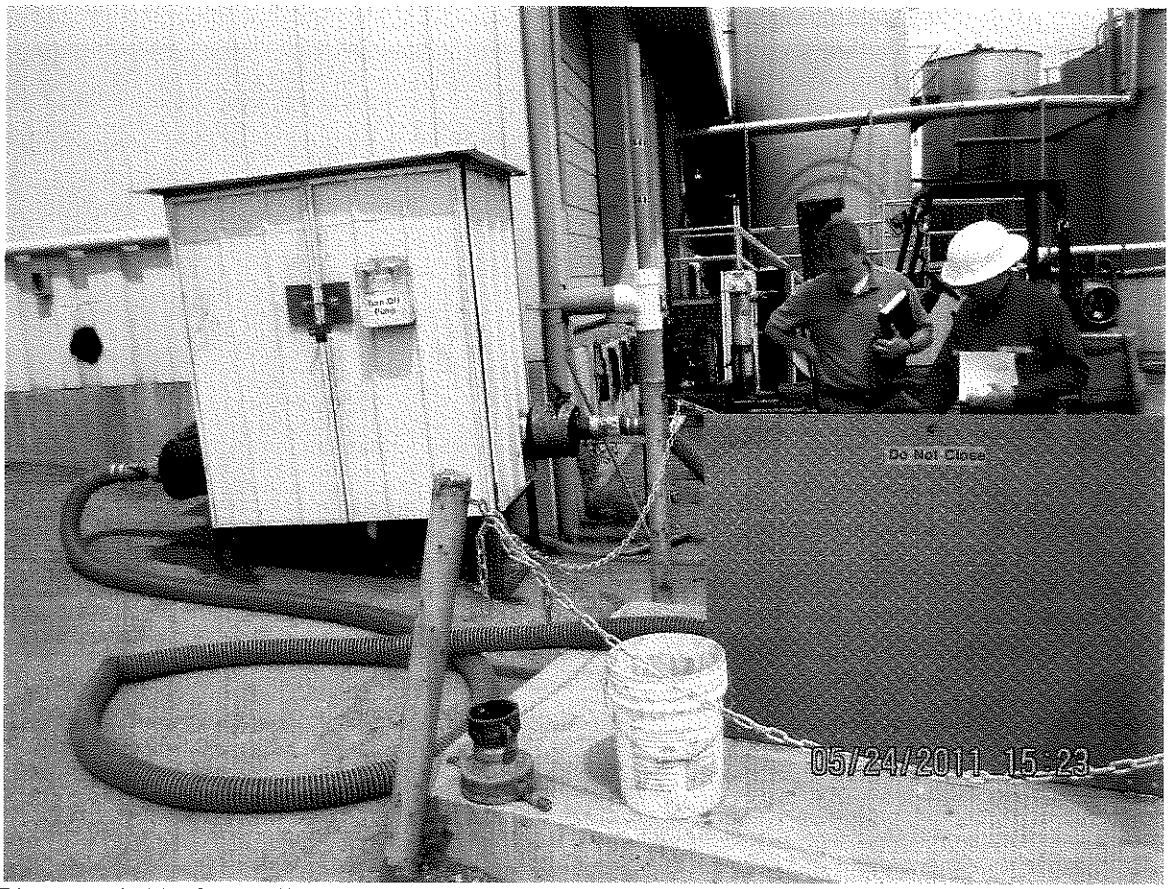


Photograph 6 of 14. Discharge tank to city sewer at left, water treatment tank in back right. M. Mikulka, U. S. EPA, LCD, 05/24/11, 1454 hrs, Cannon SD1400IS, Ser. No., 212065043412, digital media.

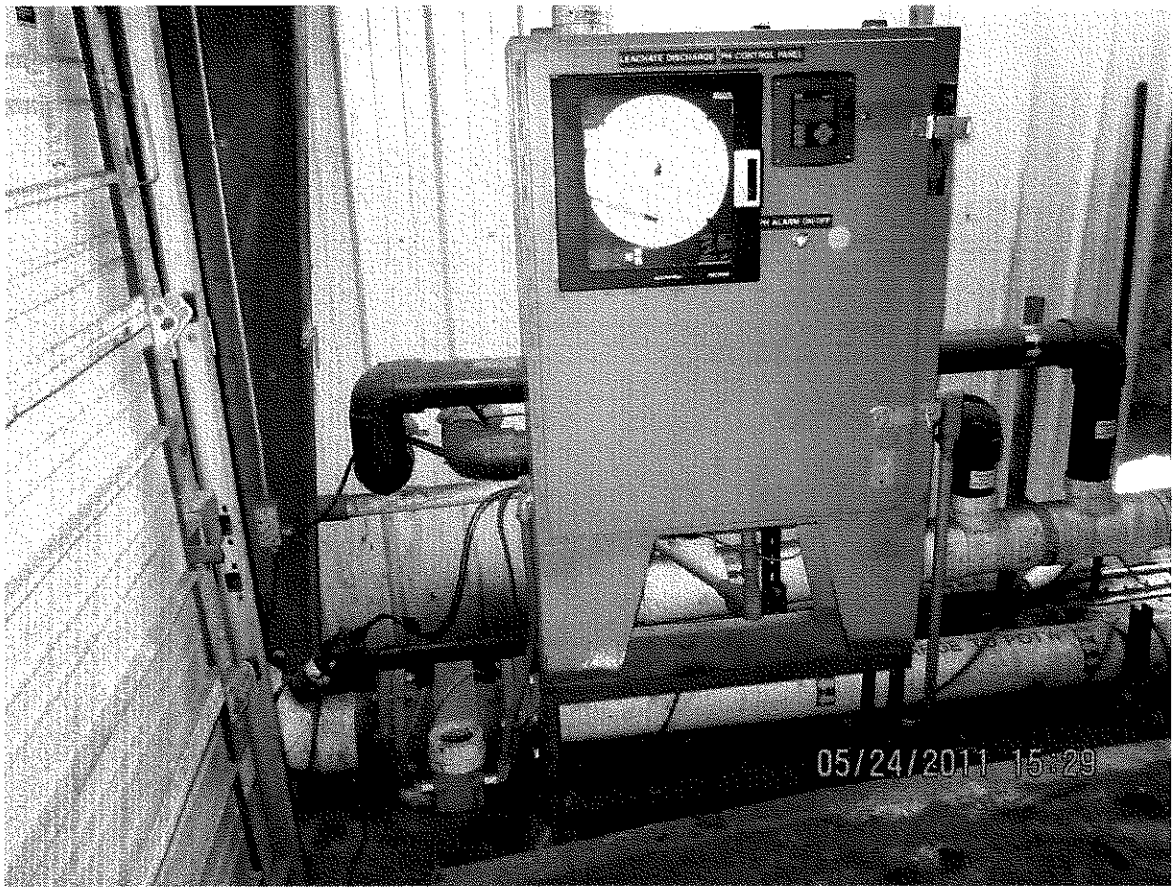
Photograph 7 of 14. Frac tanks that receive subcontractor oils. Tank at far right has 33 ppm PCBs and was locked out. M. Mikulka, U. S. EPA, LCD, 05/24/11, 1502 hrs, Cannon SD1400IS, Ser. No., 212065043412, digital media.

Photograph 8 of 14. Valve of frac tank #6383 (which has 33 ppm PCBs) with lock. M. Mikulka, U. S. EPA, LCD, 05/24/11, 1509 hrs, Cannon SD1400IS, Ser. No., 212065043412, digital media.

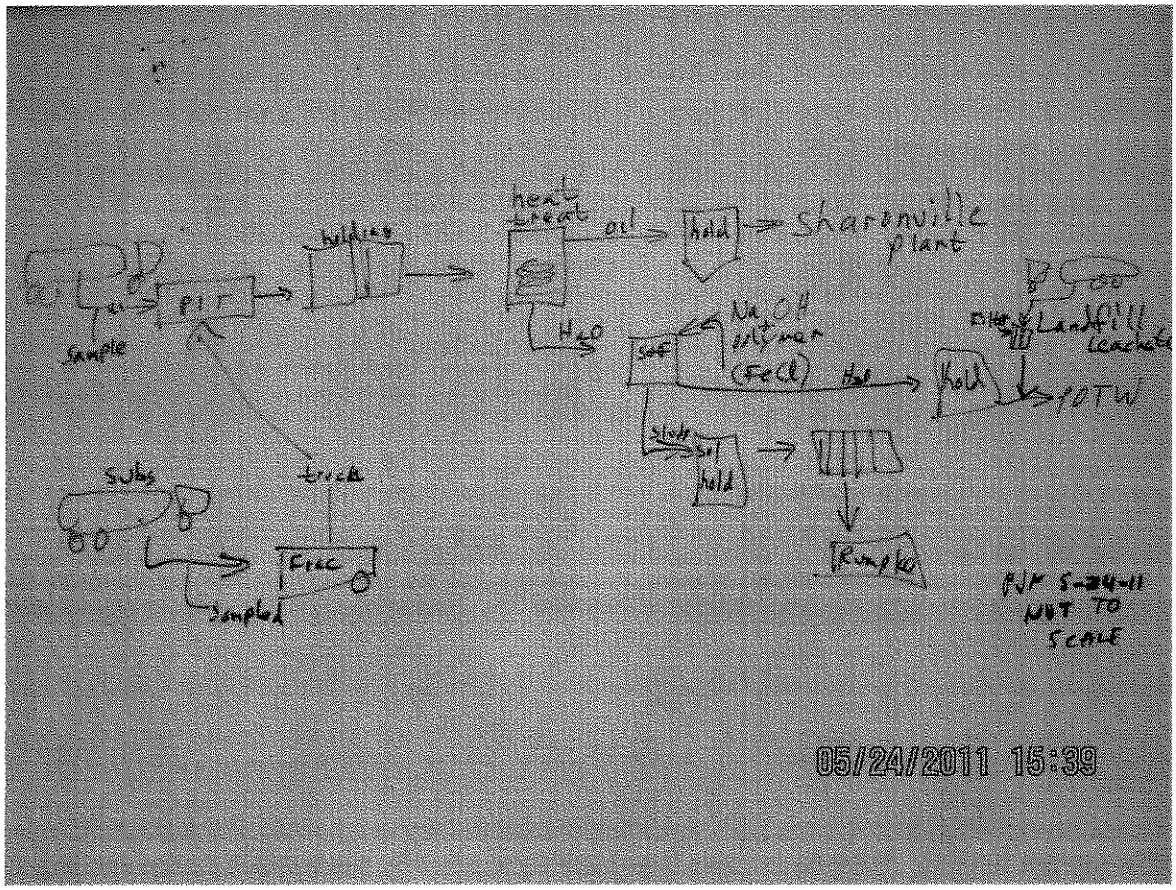
Photograph 9 of 14. Processed (outbound) oil tanks. M. Mikulka, U. S. EPA, LCD, 05/24/11, 1520 hrs, Cannon SD1400IS, Ser. No., 212065043412, digital media.



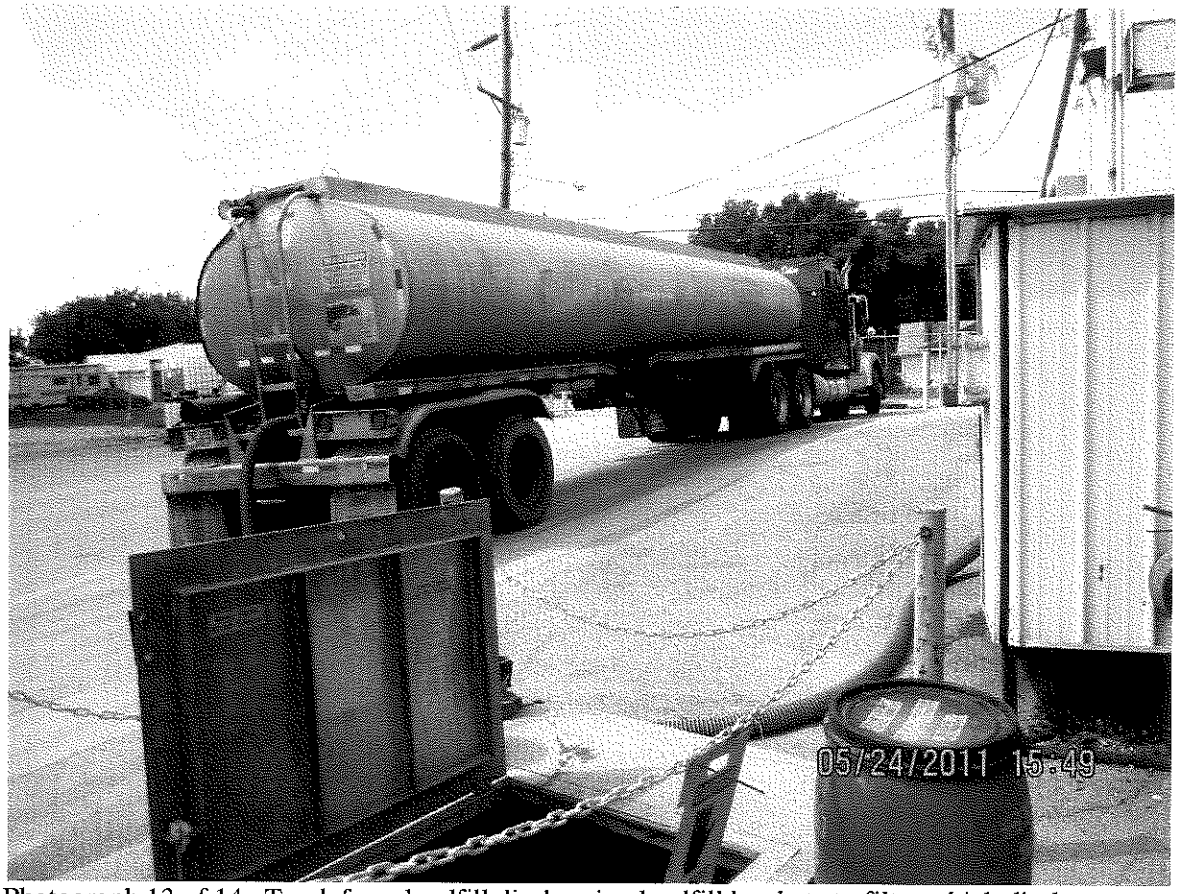
Photograph 10 of 14. Filter for leachate from landfills received by truck, which is then discharged to city sewer. M. Mikulka, U. S. EPA, LCD, 05/24/11, 1523 hrs, Cannon SD1400IS, Ser. No., 212065043412, digital media.



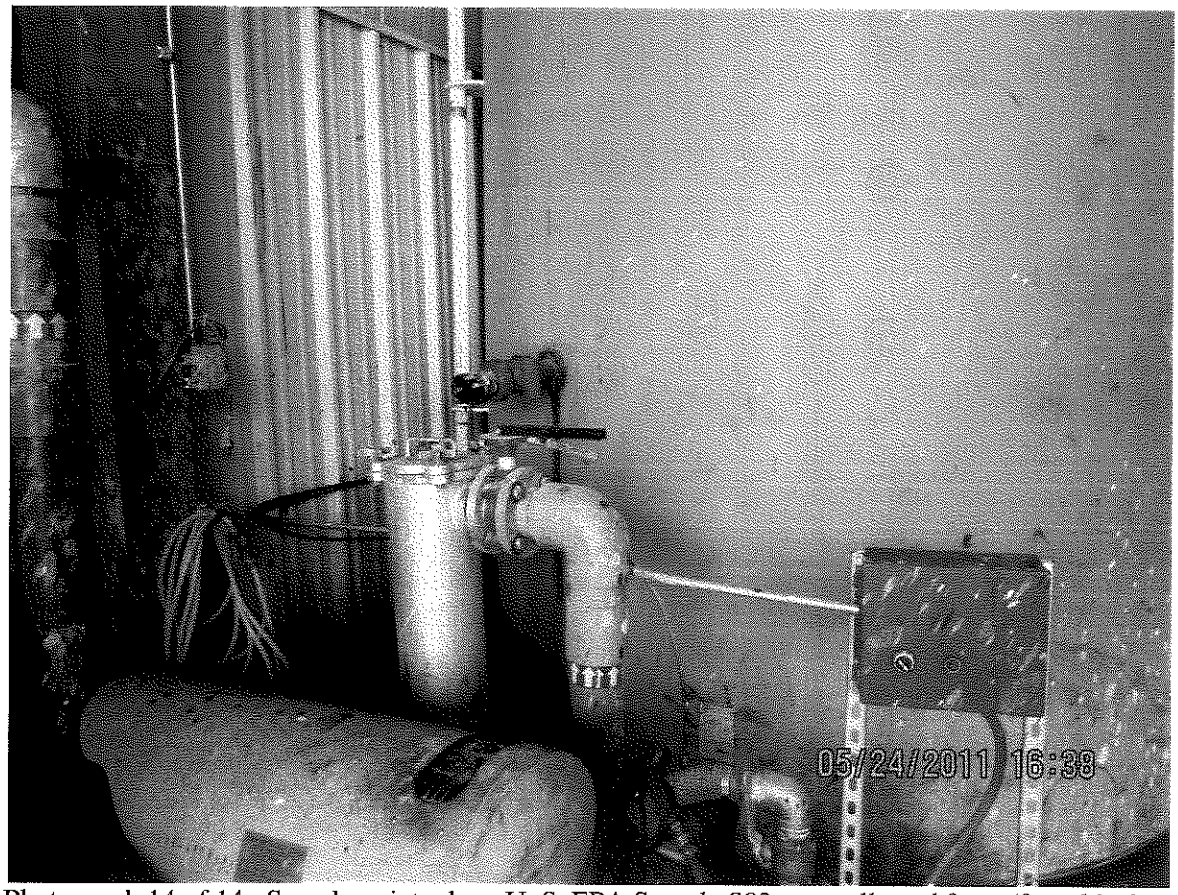
Photograph 11 of 14. Flow meter (at bottom left) and ph meter recorder for leachate fluids. M. Mikulka, U. S. EPA, LCD, 05/24/11, 1529 hrs, Cannon SD1400IS, Ser. No., 212065043412, digital media.



Photograph 12 of 14. Process schematic of facility as drawn by PJN on facility white board based on inspection. M. Mikulka, U. S. EPA, LCD, 05/24/11, 1539 hrs, Cannon SD1400IS, Ser. No., 212065043412, digital media.



Photograph 13 of 14. Truck from landfill discharging landfill leachate to filter which discharges to city sewer. M. Mikulka, U. S. EPA, LCD, 05/24/11, 1549 hrs, Cannon SD1400IS, Ser. No., 212065043412, digital media.



Photograph 14 of 14. Sample point where U. S. EPA Sample S03 was collected from (from black pipe with red valve). M. Mikulka, U. S. EPA, LCD, 05/24/11, 1538 hrs, Cannon SD1400IS, Ser. No., 212065043412, digital media.

ATTACHMENT 3

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

EPA

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

1. INVESTIGATION IDENTIFICATION			3. FACILITY NAME
DATE	INSPECTION NO.	DAILY SEQ. NO.	United Oil Recovery Services
5-24-11	F1476I	01	

2. INSPECTOR'S ADDRESS	4. FACILITY ADDRESS
U.S. EPA - OECA - Cleveland Office 25089 Center Ridge Rd. Westlake, Ohio 44145	2640 Lefferson Rd. Middletown, Ohio 45044

For Internal EPA Use. Copies may be provided to recipient as acknowledgment of this notice.

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures, articles containing same are manufactured, processed, stored or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyances being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act are applicable to the chemical substances, mixtures, or articles within, or associated with, such premise or conveyance have been complied with.

☐ In addition, this inspection extends to (check appropriate blocks):

- ☐ A. Financial data
- ☒ B. Sales data
- ☐ C. Pricing data
- ☐ D. Personnel data
- ☐ E. Research data

The nature and extent of inspection of such data specified in A through E above is as follows:

INSPECTOR'S SIGNATURE		RECIPIENT'S SIGNATURE	
Paul J. Novak		On Behalf of United	David Weber
NAME		NAME	
Paul J. Novak, Jr.		David Weber	
TITLE	DATE SIGNED	TITLE	DATE SIGNED
Geologist	5-24-11	Environmental Compliance	5/24/11

EPA FORM 7740-3 (REVISED JULY 1997) CORE TSCA --- PREVIOUS VERSIONS ARE OBSOLETE

*U.S. GPO: 2001-617-458/95780

ATTACHMENT 4

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT
TSCA INSPECTION CONFIDENTIALITY NOTICE

1. INVESTIGATION IDENTIFICATION			4. FACILITY NAME
DATE	INSPECTION NO.	DAILY SEQ. NO.	United Oil Recovery Services
5-24-11	F14761	01	
2. INSPECTOR'S NAME			5. ADDRESS
Paul J. Novak Jr.			2640 Lefferson Rd. Middletown, Ohio 45044
3. INSPECTOR'S ADDRESS			6. NAME OF CHIEF EXECUTIVE OFFICER
25089 Center Ridge Rd. Westlake, Ohio			Dave Brown
			7. TITLE
			President - C.O.O.

For internal EPA use. Copies may be provided to recipient as acknowledgment of this notice.

TO ASSERT A TSCA CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during the inspection of the facility cited above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR, Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the EPA Administrator determines that the data is entitled to confidential treatment, or may be withheld from release under other exceptions of FOIA.

Any or all information collected by EPA during the inspection may be claimed as confidential if it relates to trade secrets, commercial, or financial matters that you consider to be confidential business information (CBI). If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of CBI. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information claimed as CBI.

A CBI claim may be asserted at any time prior to, during, or after the information is collected. This notice was developed by EPA to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationary or by making the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this notice. The inspector will be glad to answer any questions you may have regarding EPA's CBI procedures.

While you may claim any collected information or sample as CBI, such claims are not likely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies), or by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is CBI.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your company within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive CBI treatment.

The statement from the Chief Executive Officer should be addressed to:

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this notice. Claims may be made at any time after the inspection, but the inspection data will not be entered into the TSCA/CBI security system until an official confidentiality claim is made. The data will be handled under EPA's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE I acknowledge receipt of this notice:		If there is no one on the premise who is authorized to make CBI claims for this facility, a copy of this notice and other inspection materials will be sent to the company's Chief Executive Officer. If there is another official who should also receive this information, please designate below.
SIGNATURE on behalf of United		NAME David J Weber
NAME		TITLE Environmental Compliance
TITLE	DATE SIGNED 5/24/11	ADDRESS

EPA FORM 7740-4 (Revise July 1997) PREVIOUS VERSIONS ARE OBSOLETE

ATTACHMENT 5

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

EPA

TOXIC SUBSTANCES CONTROL ACT

RECEIPT FOR SAMPLES AND DOCUMENTS

1. INVESTIGATION IDENTIFICATION			2. COMPANY NAME
DATE	INSPECTION NO.	DAILY SEQ. NO.	United Oil Recovery Services
5-24-11	F14761	01	

3. INSPECTOR ADDRESS	4. COMPANY ADDRESS
U.S. EPA - OECA - Cleveland Office 25089 Center Ridge Rd. Westlake, Ohio 44145	2640 Lefferson Rd. Middletown, Ohio 45044

For internal EPA use. Copies of this form may be provided to receipient as acknowledgement of the documents and samples of chemical substances and/or mixtures described below collected in connection with the administration and enforcement of the Toxic Substances Control Act.

RECEIPT OF DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:

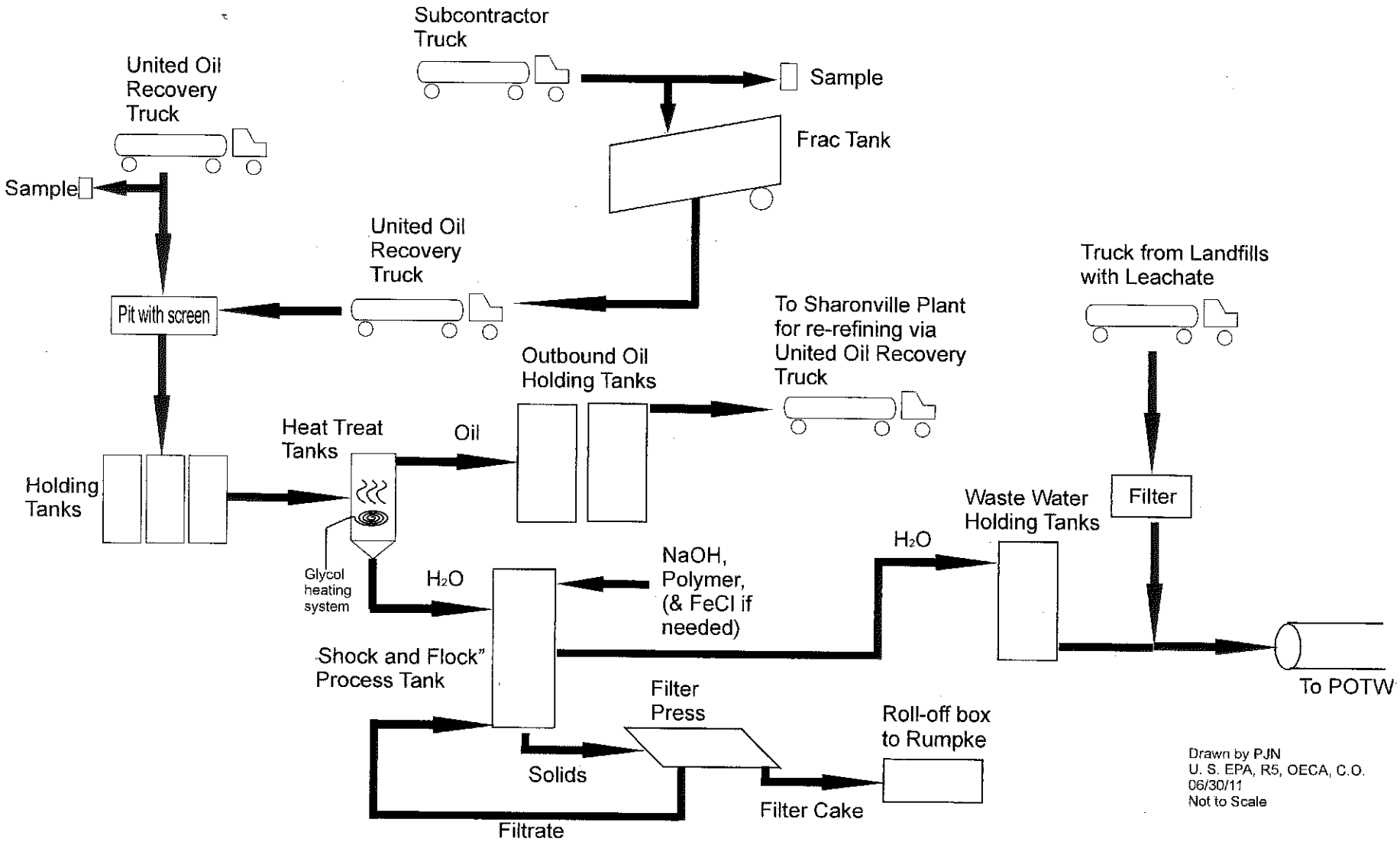
NO.	DESCRIPTION
14	photographs
2	oil samples
1	oil/water sample from pit
2	water discharge samples
1	facility layout diagram
2	sheets manifest + PCB analysis from truck

OPTIONAL:

DUPICATE OR SPLIT SAMPLES: REQUESTED AND PROVIDED ☒ NOT REQUESTED ☐

INSPECTOR SIGNATURE	CLAIMANT SIGNATURE
Paul J. Novak	on behalf of United Dave Weber
NAME: Paul J. Novak, Jr.	NAME: Dave Weber
TITLE: Geologist	DATE SIGNED: 5-24-11
TITLE: EW Compliance	DATE SIGNED: 5/24/11

ATTACHMENT 6


Subcontractor Truck
Sample
United Oil Recovery Truck
Frac Tank
Sample
United Oil Recovery Truck
Pit with screen
Truck from Landfills with Leachate
To Sharonville Plant for re-refining via United Oil Recovery Truck
Outbound Oil Holding Tanks
Heat Treat Tanks
Oil
Holding Tanks
Filter
Waste Water Holding Tanks
H_2O
NaOH, Polymer, (& FeCl if needed)
Glycol heating system
H_2O
Shock and Flock" Process Tank
To POTW
Filter Press
Roll-off box to Rumpke
Solids
Filter Cake
Filtrate
Drawn by PJN
U. S. EPA, R5, OECA, C.O.
06/30/11
Not to Scale

ATTACHMENT 7

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

4738 Gateway Circle Dayton, OH 45440 (800) 572-9839
339 W. Walton Blvd Pontiac, MI 48340 (800) 526-4951

March 11, 2011

Client:

United Waste Water Services
11807 Reading Road
Cincinnati, OH 45241

Attn: Steve Mailhot

Work Order: DUC0527
Project Name: Sharonnville PCBs
Project Number: [none]

Date Received: 03/09/11

Samples logged in at Dayton laboratory.

An executed copy of the Chain of Custody is also included as an addendum to this report.

If you have any questions relating to this analytical report, please contact your Laboratory Project Manager at the number shown above.

SAMPLE IDENTIFICATION	LAB NUMBER	COLLECTION DATE AND TIME
(*) → Frac 7	DUC0527-01	03/08/11 15:00
G M Indy	DUC0527-02	03/07/11 20:00
Safety Kleen	DUC0527-03	03/08/11
(*-1) → R & S	DUC0527-04	03/08/11
S E S	DUC0527-05	03/08/11

Ohio Certification Number: 4074, 857

Reproduction of this analytical report is permitted only in its entirety. This report shall not be reproduced except in full without the written approval of the laboratory.

TestAmerica Laboratories, Inc. certifies that the analytical results contained herein apply only to the samples tested as received by our Laboratory.

(*) Fract 7 is the fract tank at United Oil (2640 Lefferson Rd - Middletown, OH) Identified as fract 6383 during 5-24-11 visit.

(*-1) R & S is the sample name for RS used oil.

Report Approved By:

Deborah Olszowka

This report has been electronically signed.

TestAmerica Dayton
Deborah Olszowka
Dayton Senior Project Manager

D. Wilder
United Wastewater Svcs
6/1/11

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

4736 Gateway Circle Dayton, OH 45440 (800) 572-9839
339 W. Walton Blvd Pontiac, MI 48340 (800) 526-4951

United Waste Water Services
11807 Reading Road
Cincinnati, OH 45241
Steve Mailhot

Work Order: DUC0527
Project: Sharonville PCBs
Project Number: [none]

Received: 03/09/11
Reported: 03/11/11 16:11

ANALYTICAL REPORT

Analyte	Sample Result	Data Qualifiers	Units	RL	Dilution Factor	Date Analyzed	Analyst	Seq/ Batch	Method
Sample ID: DUC0527-01 (Frac 7 - Non-aqueous)						**Sampled: 03/08/11 15:00**		**Recvd: 03/09/11 16:40**	
Organochlorine Pesticides/PCBs									
PCB-1016	<0.833		mg/kg	0.833	5	03/10/11 13:43	JAP	11C0392	SW 8082
PCB-1221	<0.833		mg/kg	0.833	5	03/10/11 13:43	JAP	11C0392	SW 8082
PCB-1232	<0.833		mg/kg	0.833	5	03/10/11 13:43	JAP	11C0392	SW 8082
PCB-1242	<0.833		mg/kg	0.833	5	03/10/11 13:43	JAP	11C0392	SW 8082
PCB-1248	<0.833		mg/kg	0.833	5	03/10/11 13:43	JAP	11C0392	SW 8082
PCB-1254	<0.833		mg/kg	0.833	5	03/10/11 13:43	JAP	11C0392	SW 8082
PCB-1260	31.8		mg/kg	8.33	50	03/10/11 15:22	JAP	11C0392	SW 8082
Surr: Tetrachloro-meta-xylene (10-194%)	*112 %*					03/10/11 13:43	JAP	11C0392	SW 8082
Surr: Decachlorobiphenyl (10-180%)	*62 %*					03/10/11 13:43	JAP	11C0392	SW 8082
Sample ID: DUC0527-02 (G M Indy - Non-aqueous)						**Sampled: 03/07/11 20:00**		**Recvd: 03/09/11 16:40**	
Organochlorine Pesticides/PCBs									
PCB-1016	<0.901		mg/kg	0.901	5	03/10/11 14:03	JAP	11C0392	SW 8082
PCB-1221	<0.901		mg/kg	0.901	5	03/10/11 14:03	JAP	11C0392	SW 8082
PCB-1232	<0.901		mg/kg	0.901	5	03/10/11 14:03	JAP	11C0392	SW 8082
PCB-1242	<0.901		mg/kg	0.901	5	03/10/11 14:03	JAP	11C0392	SW 8082
PCB-1248	<0.901		mg/kg	0.901	5	03/10/11 14:03	JAP	11C0392	SW 8082
PCB-1254	<0.901		mg/kg	0.901	5	03/10/11 14:03	JAP	11C0392	SW 8082
PCB-1260	<0.901		mg/kg	0.901	5	03/10/11 14:03	JAP	11C0392	SW 8082
Surr: Tetrachloro-meta-xylene (10-194%)	*137 %*					03/10/11 14:03	JAP	11C0392	SW 8082
Surr: Decachlorobiphenyl (10-180%)	*104 %*					03/10/11 14:03	JAP	11C0392	SW 8082
Sample ID: DUC0527-03 (Safety Kleen - Non-aqueous)						**Sampled: 03/08/11**		**Recvd: 03/09/11 16:40**	
Organochlorine Pesticides/PCBs									
PCB-1016	<0.909		mg/kg	0.909	5	03/10/11 14:23	JAP	11C0392	SW 8082
PCB-1221	<0.909		mg/kg	0.909	5	03/10/11 14:23	JAP	11C0392	SW 8082
PCB-1232	<0.909		mg/kg	0.909	5	03/10/11 14:23	JAP	11C0392	SW 8082
PCB-1242	<0.909		mg/kg	0.909	5	03/10/11 14:23	JAP	11C0392	SW 8082
PCB-1248	<0.909		mg/kg	0.909	5	03/10/11 14:23	JAP	11C0392	SW 8082
PCB-1254	<0.909		mg/kg	0.909	5	03/10/11 14:23	JAP	11C0392	SW 8082
PCB-1260	<0.909		mg/kg	0.909	5	03/10/11 14:23	JAP	11C0392	SW 8082
Surr: Tetrachloro-meta-xylene (10-194%)	*136 %*					03/10/11 14:23	JAP	11C0392	SW 8082
Surr: Decachlorobiphenyl (10-180%)	*91 %*					03/10/11 14:23	JAP	11C0392	SW 8082
Sample ID: DUC0527-04 (R & S - Non-aqueous)						**Sampled: 03/08/11**		**Recvd: 03/09/11 16:40**	
Organochlorine Pesticides/PCBs									
PCB-1016	<0.935		mg/kg	0.935	5	03/10/11 14:42	JAP	11C0392	SW 8082
PCB-1221	<0.935		mg/kg	0.935	5	03/10/11 14:42	JAP	11C0392	SW 8082
PCB-1232	<0.935		mg/kg	0.935	5	03/10/11 14:42	JAP	11C0392	SW 8082
PCB-1242	<0.935		mg/kg	0.935	5	03/10/11 14:42	JAP	11C0392	SW 8082
PCB-1248	<0.935		mg/kg	0.935	5	03/10/11 14:42	JAP	11C0392	SW 8082
PCB-1254	<0.935		mg/kg	0.935	5	03/10/11 14:42	JAP	11C0392	SW 8082
PCB-1260	27.2		mg/kg	3.74	20	03/10/11 15:41	JAP	11C0392	SW 8082
Surr: Tetrachloro-meta-xylene (10-194%)	*95 %*					03/10/11 14:42	JAP	11C0392	SW 8082
Surr: Decachlorobiphenyl (10-180%)	*83 %*					03/10/11 14:42	JAP	11C0392	SW 8082

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

4738 Gateway Circle Dayton, OH 45440 (800) 572-9839
339 W. Walton Blvd Pontiac, MI 48340 (800) 526-4951

United Waste Water Services
11807 Reading Road
Cincinnati, OH 45241
Steve Mailhot

Work Order: DUC0527
Project: Sharonnville PCBs
Project Number: [none]

Received: 03/09/11
Reported: 03/11/11 16:11

ANALYTICAL REPORT

Analyte	Sample Result	Data Qualifiers	Units	RL	Dilution Factor	Date Analyzed	Analyst	Seq/ Batch	Method
Sample ID: DUC0527-05 (S E S - Non-aqueous)					**Sampled: 03/08/11**			**Recvd: 03/09/11 16:40**	
Organochlorine Pesticides/PCBs									
PCB-1016	<0.893		mg/kg	0.893	5	03/10/11 15:02	JAP	11C0392	SW 8082
PCB-1221	<0.893		mg/kg	0.893	5	03/10/11 15:02	JAP	11C0392	SW 8082
PCB-1232	<0.893		mg/kg	0.893	5	03/10/11 15:02	JAP	11C0392	SW 8082
PCB-1242	<0.893		mg/kg	0.893	5	03/10/11 15:02	JAP	11C0392	SW 8082
PCB-1248	<0.893		mg/kg	0.893	5	03/10/11 15:02	JAP	11C0392	SW 8082
PCB-1254	<0.893		mg/kg	0.893	5	03/10/11 15:02	JAP	11C0392	SW 8082
PCB-1260	<0.893		mg/kg	0.893	5	03/10/11 15:02	JAP	11C0392	SW 8082
Surr: Tetrachloro-meta-xylene (10-194%)	*134 %*					03/10/11 15:02	JAP	11C0392	SW 8082
Surr: Decachlorobiphenyl (10-180%)	*101 %*					03/10/11 15:02	JAP	11C0392	SW 8082

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

4738 Gateway Circle Dayton, OH 45440 (800) 572-9839
339 W. Walton Blvd Pontiac, MI 48340 (800) 526-4951

United Waste Water Services	Work Order:	DUC0527	Received:	03/09/11
11807 Reading Road	Project:	Sharonville PCBs	Reported:	03/11/11 16:11
Cincinnati, OH 45241	Project Number:	[none]		
Steve Mailhot				

CERTIFICATION SUMMARY

Any abnormalities or departures from sample acceptance policy shall be documented on the Chain of Custody and/or Case Narrative included with this report.

For information concerning certifications of this facility or another TestAmerica facility, please visit our website at www.TestAmericainc.com

Samples collected by TestAmerica Field Services personnel are noted on the Chain of Custody (COC).

DATA QUALIFIERS AND DEFINITIONS

ADDITIONAL COMMENTS

Results are reported on a wet weight basis unless otherwise noted in the units.

ANALYSIS LOCATIONS

Any analyses listed below were analyzed in satellite facilities

Chain of Custody Record

DU COSZZ

TestAmerica
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TestAmerica Laboratory location: _____
Regulatory program: ☐ DW ☐ NPDES ☐ RCRA ☐ Other _____

TestAmerica Laboratories, Inc.

Client Contact				
Company Name: United Waste Water	Client Project Manager: Steve Mailhot	Site Contact: Steve Mailhot	Lab Contact: Matt Bachieri	COC No:
Address: 11807 Reading Road	Telephone: (513) 200-4945	Telephone: (513) 200-4945	Telephone:	1 of 1 COCs
City/State/Zip: Cincinnati OH 45241	Email: SMailhot@Teamuse.com	Analysis Turnaround Time (In BUSINESS days)	Analyses	For lab use only
Phone: (513) 200-4945		TAT if different from below _____		Walk-in client: ☐
Project Name: Sharonville PCB	Method of Shipment/Carrier:	☐ 3 weeks ☐ 2 weeks ☐ 1 week ☒ 2 days ☐ 1 day		Lab sampling: ☐
Project Number: Sharonville PCB	Shipping/Tracking No:			Job/SDG No.:
PO#				

Sample Identification	Sample Date	Sample Time	Matrix: Air	Aqueous	Sediment	Solid	Other: Oil	Containers & Preservatives: HCl	HNO3	H2SO4	NaOH	NaOH/ZnOAc	Unpres	Other	Filtered Sample (Y/N)	Composite/Grab	PCB	Sample Specific Notes / Special Instructions:
FBAC 7	3/8/11	3:00pm		X									X				X	
GM Enzy	3/7/11	8:00am		X									X				X	
Safety Kleen	3/8/11			X									X				X	
R+S	3/8/11			X									X				X	
SES	3/8/11			X									X				X	

Possible Hazard Identification: ☐ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown

Sample Disposal (A fee may be assessed if samples are retained longer than 1 month): ☐ Return to Client ☐ Disposal By Lab ☐ Archive For _____ Months

Special Instructions/QC Requirements & Comments:

RUSH

Relinquished by:	Company: United	Date/Time: 3:45 pm	Received by:	Company:	Date/Time:
Relinquished by:	Company:	Date/Time:	Received by:	Company:	Date/Time:
Relinquished by:	Company:	Date/Time:	Received in Laboratory by:	Company: TA	Date/Time: 3/9/11 1640

7018 (1008)

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Cooler/Sample Receipt

☐ MSDS or Known Hazard Information Supplied by Client
☐ Bottle stickers applied ☐ ELEMENT comment entered ☐ MSDS/COC scanned/emailed to EH&S
☐ Discrepancies Client ID WOW
☐ Short Hold Work Order # MX0527
☒ Rush ☐24hr ☒2day ☐3day ☐5day ☐other
Receipt evaluation performed by - Initials: BS Date: 3/9/11 Time: 1640

Method of Shipment:
☒ Walk-In Client ☐ TestAmerica Field/Courier
☐ Other Client/3rd Party Courier
☐ Fed Ex Tracking #
☐ UPS Tracking #
☐ Other

Shipping Container Type:
☒ Cooler ☐ Box
☐ None ☐ Other
Packing Materials:
☒ Plastic Bags ☐ Foam
☐ Bubble Wrap ☐ Paper
☐ Packing Peanuts ☐ None
☐ Other

Custody Seals Intact:
☐ Yes ☐ No
☒ N/A (not used or required)
Cooling Materials:
☒ Ice *(solid)* ☐ Ice *(Melted)*
☐ Blue Ice ☐ None
☐ Other

Are there any soil samples from areas requiring USDA quarantine? *(AL, AR, AZ, CA, FL, GA, HI, ID, LA MS, NC, NM, NY, OK, SC, TN, TX, VA, Puerto Rico, Virgin Islands, any other Non-Domestic area)* ☒ No ☐ Yes (If Yes, *Project Manager must be notified).*

☐ Check If Additional Sheets Required

Receipt Temperatures

Thermometer ID	Observed (°C)	Corrected (°C)	Temp Blank	Sample Temp	Received on same day sampled?	Acceptable?*	Cooler ID	Note Affected Samples if temperature not acceptable
6	12.8	12.3	☐	☒	☒Yes ☐No	☒Yes ☐No		
			☐	☐	☐Yes ☐No	☐Yes ☐No		
			☐	☐	☐Yes ☐No	☐Yes ☐No		

* Receipt temperatures are considered acceptable if the samples are received on the same day they were collected & show signs that the cooling process has started. Temperature acceptance for most tests is ≤6.0°C, but not frozen. For additional information, please refer to SOP DT-SCA-004 *Sample Receipt and Login, Attachment 2 – Holding Times, Preservation and Container Requirements.*

Receipt Questions**	Y	N	n/a	"No" answers require additional comment
COC present & TA receipt signature, date, & time properly documented?	✓			
Containers & labels in good condition? *(unbroken, not leaking, appropriately filled, labels legible & attached)*	✓			
Appropriate containers used & adequate volume provided?	✓			
Number of sample containers match COC?	✓			
Samples received within hold time?	✓			
Samples submitted for GRO and Volatiles analyses (8260, 624, 524) received without headspace?			✓	
Was a Trip Blank received with VOA samples?			✓	
Were the samples free of any questionable physical conformities? For example, field duplicates or multiple bottles of the same sample do not significantly vary in appearance (color, proportion of solids, etc.)	✓			
Were the COC, bottle labels, and all other items free of all other discrepancies or issues that would need to be addressed with the Project Manager and/or Client?	✓			

** May not be applicable if samples are not for compliance testing

Client Contact Record
Contact via: ☐ Phone ☐ Email ☐ Other Person Contacted: Date/Time:
☐ Discrepancy allowance agreement is on record in the client project file.
Discussion/Resolution:

Any additional documentation and clarification from client must be noted in the narrative and/or scanned into the COC directory.

TM 3/10/11
Reviewed by PM Signature Date

ATTACHMENT 8

CITY OF MIDDLETOWN
DEPARTMENT OF ENVIRONMENTAL SERVICES
WASTEWATER TREATMENT PLANT

Permit No. 116-2012
Categorical: Part 437 – Centralized Waste Treatment
Subcategory D (Oils & Organics)

INDUSTRIAL USER PERMIT

In accordance with the provisions of City of Middletown Ordinance 091-24, Section 5:

United Oil Recovery Services, Inc.
2640 Lefferson Road
Middletown, Ohio 45044

is hereby authorized to discharge industrial wastewater from the above identified facility and through the outfall identified herein into the City of Middletown collection and treatment facilities in accordance with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all applicable pretreatment regulations, standards, or requirements under local, state, and federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

Noncompliance with any term or condition of this permit shall constitute a violation of the City of Middletown Sewer Use Ordinance 091-24.

This permit shall become effective on January 31, 2010 and shall expire at midnight on January 31, 2012.

If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a renewal permit on a form supplied by the City in accordance with the requirements of Sewer Use Ordinance 091-24, Section 5.02.5, a minimum of 180 days prior to the expiration date.

By: Paul Fraley Jr.
Paul Fraley, Jr., P.E.
Wastewater Treatment Manager

Issued this 28th day of January 2010

PART 1(a) SPECIAL TERMS & CONDITIONS

A. Recordkeeping

The facility shall maintain the following records on-site and immediately available to the City and its representatives:

1. A log of all incoming loads as to generator, volume, and waste profile.
2. All "in-house" laboratory bench sheets and data for all analyses performed whether related to process control or QA/QC.
3. Daily effluent pH and flow monitoring data.
4. Calibration data for the effluent pH and flow meters.

B. Effluent Monitoring

1. The facility will provide the necessary flow monitoring and sampling equipment to collect 24-hour flow proportioned composite samples.
2. Note monitoring responsibilities in Part 2 below.

C. Direct Discharge Without Treatment

1. Only **municipal landfill leachate** may be discharged directly to the City collection system without treatment. Direct discharge of all other streams, regardless of source or composition, is prohibited.
2. The City may pre-approve additional wastewater streams for direct sewer discharge following submittal of the following information and a sample to the City:

a) Landfill name, location, contact name & phone number.
b) The estimated volumes and delivery frequency to Middletown.
c) A one gallon representative sample, delivered to the Middletown POTW.
d) The following analytical data from a representative sample:
Total Cr, Cd, Cu, Ni, Pb, Zn, Mo, Se, Ba, As, CN, low level Hg,
C-BOD, NH3, pH, MBAS, TTO
e) A detailed disposal history for the waste stream including:
- All previous disposal methods, listed in chronological order.
- The name and location of all POTWs that have ever treated the waste stream.
- An explanation of why the proposed material would be transported to Middletown if other POTWs are closer to the landfill or if the facility is served by a local POTW.

Upon receipt and review of the information above, the City will decide if the proposed stream is acceptable for treatment and the quantities that may be discharged.

PART 1(b) EFFLUENT LIMITATIONS

A. During the period of January 31, 2010 to January 31, 2012, the permittee is authorized to discharge process wastewater to the City of Middletown collection and treatment facilities from the outfall listed below.
Description of outfall:

Outfall	Description
116-001	The outfall is the effluent sample pit, located outdoors, at the southwest corner of the main building – see Appendix A.

B. During the period of January 31, 2010 to January 31, 2012, the discharge from outfall 116-001 shall not exceed the following effluent limitations. Effluent from this outfall consists of municipal landfill leachate, pretreated process wastewater and wash water generated by the permittee.

EFFLUENT LIMITATIONS

Parameter	Daily Maximum	Monthly Average
Flow	250,000 GPD	---
Cyanide, T	5.0 mg/l (local limit)	---
Cadmium, T	3.0 mg/l (local limit)	---
Mercury, T	0.2 mg/l (local limit)	---
Nickel, T	15.0 mg/l (local limit)	---
Chromium, T	0.947 mg/l (categorical limit)	0.487 mg/l
Cobalt, T	56.4 mg/l (categorical limit)	18.8 mg/l
Copper, T	0.405 mg/l (categorical limit)	0.301 mg/l
Lead, T	0.222 mg/l (categorical limit)	0.172 mg/l
Tin, T	0.249 mg/l (categorical limit)	0.146 mg/l
Zinc, T	6.95 mg/l (categorical limit)	4.46 mg/l
Bis(2-ethylhexyl) phthalate	0.267 mg/l (categorical limit)	0.158 mg/l
Carbazole	0.392 mg/l (categorical limit)	0.233 mg/l
o-Cresol	1.92 mg/l (categorical limit)	0.561 mg/l
p-Cresol	0.698 mg/l (categorical limit)	0.205 mg/l
n-Decane	5.79 mg/l (categorical limit)	3.31 mg/l
Fluoranthene	0.787 mg/l (categorical limit)	0.393 mg/l
n-Octadecane	1.22 mg/l (categorical limit)	0.925 mg/l
2,4,6-Trichlorophenol	0.155 mg/l (categorical limit)	0.106 mg/l
pH	5-12 S.U. (local limit)	---
Cyanide, free		Monitor Only

1. Daily Maximum - The maximum allowable discharge of pollutant during a calendar day. Where daily maximum limitations are expressed in units of mass, the daily discharge is the total mass discharged over the course of the day. Where daily

maximum limitations are expressed in terms of a concentration, the daily discharge is the arithmetic average measurement of the pollutant concentration derived from all measurements taken that day.

2. Monthly Average - The arithmetic mean of the values for effluent samples collected during a calendar month or specified 30-day period.

C. All discharges shall comply with all other applicable laws, regulations, standards, and requirements contained in City of Middletown Sewer Use Ordinances 091-24, & 091-48, and any applicable state and federal pretreatment laws, regulations, standards, and requirements including any such laws, regulations, standards, or requirements that may become effective during the term of this permit.

PART 2 MONITORING REQUIREMENTS

A. From the period beginning on the effective date of the permit until January 31, 2012, the permittee shall monitor outfall 116-001 for the following parameters, at the indicated frequency:

Sample Parameter (units)	Measurement Location	Frequency	Sample Type
Flow (GPD)	See note-1	Daily	Continuous
Cyanide, T (mg/l)	See notes-3,4	Quarterly	Grab
Cadmium (mg/l)	See notes-2,3	Quarterly	24-hour composite
Low Level Mercury (ng/l)	See notes-2,3	Quarterly	24-hour composite
Nickel (mg/l)	See notes-2,3	Quarterly	24-hour composite
Chromium (mg/l)	See notes-2,3	Quarterly	24-hour composite
Cobalt (mg/l)	See notes-2,3	Quarterly	24-hour composite
Copper (mg/l)	See notes-2,3	Quarterly	24-hour composite
Lead (mg/l)	See notes-2,3	Quarterly	24-hour composite
Tin (mg/l)	See notes-2,3	Quarterly	24-hour composite
Zinc (mg/l)	See notes-2,3	Quarterly	24-hour composite
Bis (2-ethylhexyl) phthalate (mg/l)	See notes-2,3	Quarterly	24-hour composite
Carbozale	See notes-2,3	Quarterly	24-hour composite
o-Cresol	See notes-2,3	Quarterly	24-hour composite
p-Cresol	See notes-2,3	Quarterly	24-hour composite
n-Decane	See notes-2,3	Quarterly	24-hour composite
Fluoranthene	See notes-2,3	Quarterly	24-hour composite
n-Octadecane	See notes-2,3	Quarterly	24-hour composite
2,4,6-Tricholrophenol	See notes-2,3	Quarterly	24-hour composite
pH (S.U.)	See note-1,4	Daily	Continuous

1. Flow and pH are to be measured at outfall point 116-001. Monitoring and recordkeeping for these parameters are the responsibility of the facility.

2. To be collected at outfall point 116-001. A 24-hour composite sample is composed of discrete sample aliquots collected in one container at constant time intervals providing representative samples irrespective of stream flow.

3. A quarterly sample should be taken once every three months: January-March first quarter, April-June second quarter, July-September third quarter and October-December fourth quarter. A total of three daily 24-hour composites must be taken during each sampling event.

4. To be collected from outfall point 116-001. A grab sample is an individual sample collected in less than 15 minutes, without regard for flow or time.

B. All handling and preservation of collected samples and laboratory analyses of samples shall be performed in accordance with 40 CFR Part 136 and amendments thereto unless specified otherwise in the monitoring conditions of this permit.

C. Samples shall be taken while the plant is in normal operation. If operation is less than 24 hours, sampling shall be undertaken during the normal daily shift.

PART 3 REPORTING REQUIREMENTS

A. Monitoring Reports

Monitoring results obtained shall be summarized and reported to the City on an acceptable Report Form – see Appendix B. The reports are due within 30 days of any sampling event performed by the Permittee. The report shall indicate the nature and concentration of all pollutants in the effluent for which sampling and analyses were performed during the sampling event including measured maximum and average daily flows.

If the permittee monitors any pollutant more frequently than required by this permit, using test procedures prescribed in 40 CFR Part 136 or amendments thereto, or otherwise approved by EPA or as specified in this permit, the results of such monitoring shall be included in any calculations of actual daily maximum or monthly average pollutant discharge and results shall be reported in the report submitted to the City of Middletown. Such increased monitoring frequency shall also be indicated in the report.

B. Accidental Discharge Report

1. The permittee shall notify the City of Middletown Wastewater Treatment Plant immediately upon the occurrence of an accidental discharge of substances prohibited by Sewer Use Ordinances 091-24, Section 3.03, & 091-48 of any slug loads or spills that may enter the public sewer – see report form, Appendix C. During normal business hours the Wastewater Treatment Plant should be notified by telephone at 425-7989. At all other times, the Wastewater Treatment Plant should be notified by telephone at 425-7994 after 5 P.M. Monday - Friday or weekends and holidays. The

notification shall include location of discharge, date and time thereof, type of waste, including concentration and volume, and corrective actions taken. The permittee's notification of accidental releases in accordance with this section does not relieve it of other reporting requirements that arise under local, State, or Federal laws.

Within five days following an accidental discharge, the permittee shall submit to the City of Middletown Industrial Pretreatment Coordinator, a detailed written report. The report shall specify:

a. Description and cause of the upset, slug load or accidental discharge, the cause thereof, and the impact on the permittee's compliance status. The description should also include location of discharge, type, concentration and volume of waste.

b. Duration of noncompliance, including exact dates and times of noncompliance and, if the noncompliance is continuing, the time by which compliance is reasonably expected to occur.

c. All steps taken or to be taken to reduce, eliminate, and/or prevent reoccurrence of such an upset, slug load, accidental discharge, or other conditions of noncompliance.

C. Reports of Changed Conditions

The permittee shall notify the City of Middletown Industrial Pretreatment Coordinator 90 days prior to any facility expansion, production increase, or process modification which results in a significant change in the discharge. A "significant change" is defined as (1) any volume or previously reported pollutant concentration increase of 20% or more; (2) the discharge of any previously unreported pollutants, or (3) any other change in the nature of the discharge that may impact the POTW.

All reports required by this permit shall be submitted to the City of Middletown at the following address:

City of Middletown Wastewater Treatment Plant
Industrial Pretreatment Coordinator
300 Oxford State Road
Middletown, Ohio 45044-7433

PART 4 STANDARD CONDITIONS

SECTION 1 - GENERAL CONDITIONS AND DEFINITIONS

A. SEVERABILITY

If any provision, paragraph, word, section or chapter of these regulations is invalidated by any court of competent jurisdiction, the remaining provisions, paragraphs, words, sections, and chapters shall not be affected and shall continue in full force and effect.

B. DUTY TO COMPLY

The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for administrative action, or enforcement proceedings including civil or criminal penalties, injunctive relief, and summary abatements.

C. PERMIT MODIFICATIONS

The City reserves the right to amend any Wastewater Contribution Permit issued hereunder with applicable laws and regulations. Within nine months of the promulgation of a National Categorical Pretreatment Standard, the Wastewater Contribution Permit of each user subject to such standards shall be revised to require compliance with such standards within the time frame prescribed by such standards. All National Categorical Pretreatment Standards adopted after promulgation of these regulations shall be adopted by the City as part of these regulations. Where a user, subject to a National Categorical Pretreatment Standard, has not previously submitted an application for a Wastewater Contribution Permit as required by Sewer Use Ordinance 091-24; Section 5.02.2, the user shall apply for a Wastewater Contribution Permit from the City within 180 days after the promulgation of the applicable National Categorical Pretreatment Standard, by the U.S. EPA. In addition, the user with an existing Wastewater Contribution Permit shall submit to the City within 180 days after the promulgation of an applicable National Categorical Pretreatment Standard, the information required by Sewer Use Ordinance 091-24 paragraph (i) of Section 5.02.2. The user shall be informed of any proposed changes in his permit at least 30 days prior to the effective date of change. Any changes or new conditions in the permit shall include a reasonable time schedule for compliance.

D. REVOCATION OF PERMIT

Any user who violates the following conditions of these Regulations, or applicable State and Federal Pretreatment Regulations, is subject to have his permit revoked in accordance with the procedures of this Section:

a) Failure of the user to factually report the wastewater constituents and characteristics of his discharge;

b) Failure of the user to report significant changes in operations, or wastewater constituents and characteristics;

c) Refusal of reasonable access to the user's premises for the purpose of inspection or monitoring; or,

d) Material violation of conditions of the permit.

E. PROPERTY RIGHTS

The issuance of this permit does not convey any property rights of any sort, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any violation of Federal, State, or local laws or regulations.

F. LIMITATIONS ON PERMIT TRANSFER

Wastewater Contribution Permits are issued to a specific user for a specific operation and are not assignable to another user without prior written approval of the City, or transferable to any other location.

G. DILUTION

No user shall increase the use of potable or process water in any way, nor mix separate waste streams for the purpose of diluting a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the standards set forth in these regulations.

H. DEFINITIONS

Unless the context specifically indicates otherwise, the following terms and phrases, as used in Sewer Use Ordinance 091-24, shall have the meanings hereinafter designated.

Act - The Clean Water Act (33 U.S.C. 1251 et. seq.) as amended.

Bypass - The intentional diversion of waste streams from any portion of a users pretreatment facility.

Categorical Pretreatment Standards - National Pretreatment Standards specifying quantities or concentrations of pollutants or pollutant properties which may be discharged or introduced into the collection and treatment facilities by specific industrial users.

City - City of Middletown.

Collection and Treatment Facilities - Sewers, pump stations and all wastewater and sludge treatment processes and equipment owned by the City of Middletown.

Indirect Discharge - The discharge or introduction of non-domestic pollutants from a source regulated under Section 307 (b) or (c) of the Act, into the collection and treatment facilities.

Industrial Waste - Solid, liquid or gaseous wastes resulting from any industrial, manufacturing, trade, or business process or from the development, recovery or processing of natural resources.

Interference - A discharge which alone or in conjunction with a discharge or discharges from other sources both: (1) inhibits or disrupts the City's wastewater treatment facility, its treatment processes or operations, or its sludge processes, use or disposal; and (2) therefore is a cause of a violation of any requirement of the City's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal as defined in 40 CFR 403.31.

mg/l - Milligrams per liter.

New Source - Any building, structure, facility or installation from which there is or may be a discharge of pollutants, the construction of which commenced after the publication of proposed Pretreatment Standards under Section 307 (c) of the Act and as defined by 40 CFR 403.3 (k).

NPDES - National Pollutant Discharge Elimination System permit program as administered by the USEPA or State.

O & M - Operation and Maintenance.

Other Wastes - Decayed wood, sawdust, shavings, bark, lime, refuse, ashes, garbage, offal, oil, tar, chemicals and all other substances except sewage and industrial wastes.

Passthrough - A discharge which exits the City's wastewater treatment facility into waters of the United States in quantities or concentrations which alone or in conjunction with a discharge from other sources, is a cause of a violation of any requirement of the City's NPDES permit (including an increase in the magnitude or duration of a violation).

pH - Logarithm (base 10) of the reciprocal of the hydrogen ion concentration.

Pollutant - Any substance discharged into the City's collection and treatment facilities or included in the City's NPDES Permit, or any substance which upon exposure to or assimilation into any organism will cause adverse effects such as cancer, genetic mutation or psychological manifestations as defined in standards issued pursuant to Section 307 (a) of the Act.

POTW - Publicly owned treatment works.

Pretreatment - The reduction of the amount of pollutants, the elimination of pollutants, or the alteration of the nature of pollutant properties in wastewater to a less harmful state prior to or in lieu of discharging or otherwise introducing such pollutants into the treatment facilities.

Sewage - Water-carried human wastes or a combination of water-carried wastes from residence, business building, institutions and industrial establishments, together with such ground, surface, storm or other water as may be present.

Sewer - Any pipe, conduit, ditch or other device used to collect and transport sewage or storm water from the generating source.

Significant Industrial Users -

a) Except as provided in Part (b) of this section, the term Significant Industrial User includes:

   (i) All industrial users subject to categorical pretreatment standards; and
   (ii) Any other industrial user that: discharges an average of 25,000 gallons per day or more of process wastestream to the POTW; discharges a process wastestream which makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW, or has a reasonable potential, in the opinion of the Director of Public Works, to adversely affect the POTW's operation or to violate any pretreatment standard or requirement.

b) The office of the Director of Public Works may at any time, on its own initiative or in response to a petition received from an industrial user, determine that a non-categorical industrial user is not a significant industrial user if the industrial user has no reasonable potential to adversely affect the POTW's operation or to violate any pretreatment standard or requirement.

Significant Violation - A violation which remains uncorrected forty-five days after notification of non-compliance which is part of a pattern of non-compliance over a twelve month period; which involves failure to accurately report non-compliance; or resulted in the City to exercise its emergency authority under Section 6.01 of Sewer Use Ordinance 091-24. (NOTE: This definition pertains to the annual publication requirements listed under Section 6.07 of Sewer Use Ordinance 091-24. See Significant Non-Compliance definition for non-compliance in other enforcement actions.)

Slugload - Any discharge which by virtue of quantity or quality is of such magnitude above the user's discharge limitation that it causes an incidence of interference or pass-through at the City's treatment facility.

Toxic Pollutant - Any pollutant or combination of pollutants designated by Federal Regulations pursuant to Section 307 of the Act.

Upset - An exceptional incident in which a user unintentionally and temporarily is in a state of non-compliance with applicable pretreatment standards due to factors beyond the reasonable control of the user and excluding non-compliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventative maintenance, or careless or improper operation thereof.

User-Industrial User - Any user of the City's wastewater collection and treatment facilities identified in the Standard Industrial Classification Manual of the U.S. Office of Management and Budget, as amended and supplemented under the following divisions:

a) Division A - Agriculture, Forestry, and Fishing
b) Division B - Mining
c) Division D - Manufacturing
d) Division E - Transportation, Communication, Gas, Electric, and Sanitary Service
e) Division I - Services

I. GENERAL DISCHARGE PROHIBITIONS

No user shall contribute or cause to be contributed, directly or indirectly, any pollutant or wastewater which will interfere with the operation or performance of the City's wastewater collection and treatment facilities, or contaminate the sludge resulting therefrom such that its use or disposal by the City's chosen method is prevented. These general prohibitions apply to all such users of the City's wastewater collection and treatment facilities whether or not the user is subject to the National Categorical Pretreatment Requirements. A user may not contribute the following substances to the City's wastewater collection and treatment facilities:

a) Pollutants which create a fire or explosion hazard in the City's wastewater collection and treatment facilities, including, but not limited to, wastestreams with

a closed cup flash point of less than 140 degrees Fahrenheit or 60 degrees Centigrade using the test method specified in 40 CFR 261.21.

b) Solid or viscous substances which may cause obstruction to flow in a sewer or other interference with the operation of the wastewater treatment facilities such as, but not limited to: grease, garbage with particles greater than one-half inch in any dimension, animal guts or tissues, paunch manure, bones, hair, hides or fleshings, entrails, whole blood, feathers, ashes, cinders, sand, spent lime, stone or marble dust, metal, glass, straw, shavings, grass clippings, rags, spent grains, spent hops, waste paper, wood, plastics, gas, tar, asphalt residues, residues from refining, or processing of fuel or lubricating oil, mud, or glass grinding or polishing wastes.

c) Any wastewater having a pH less than 5.0 or higher than 12.0 unless the City determines its treatment facilities are able to accommodate such wastewater, or wastewater having any other corrosive property capable of causing damage or hazard to structures, equipment, and/or personnel of the City's wastewater collection and treatment facilities.

d) Pollutants which result in the presence of toxic gases, vapors, or fumes into the City's wastewater collection and treatment facilities in a quantity that: may cause acute worker health and safety problems; may injure or interfere with any wastewater treatment process; may create a toxic effect in the receiving waters.

e) Any noxious or malodorous liquids, gases, or solids which either singly or by interaction with other wastes are sufficient to create a public nuisance or hazard to life or are sufficient to prevent entry into the sewers for maintenance and repair.

f) Any substance which may cause the City's wastewater collection and treatment facilities effluent or any other product of the City's wastewater collection and treatment facilities such as residues, sludges, or scums, to be unsuitable for reclamation and reuse or to interfere with the reclamation process. In no case, shall a substance discharged to the City's wastewater collection and treatment facilities cause the City's wastewater collection and treatment facilities to be in non-compliance with (1) sludge use or disposal criteria, guidelines or regulations developed under Section 405 of the Act or (2) any criteria, guidelines, or regulations affecting sludge use or disposal developed pursuant to the Solid Waste Disposal Act, the Clean Air Act, the Toxic Substances Control Act, or State criteria applicable to the sludge management method being used.

g) Any substance which will cause the City's wastewater collection and treatment facilities to violate its NPDES and/or State Disposal System Permit or the receiving water quality standards.

h) Any wastewater with objectionable color not removed in the treatment process, such as, but not limited to, dye wastes and vegetable tanning solutions.

i) Any wastewater having a temperature which will inhibit biological activity in the City's wastewater treatment facilities resulting in interference, but in no case wastewater which causes a temperature at the introduction into the City's wastewater treatment facilities which exceeds 40°C (104°F).

j) Any pollutants, including oxygen demand pollutants (BOD, ammonia, etc.), released at a flow rate and/or pollutant concentration which a user knows or has reason to know will cause interference to the City's wastewater collection and treatment facilities.

k) Any wastewater containing any radioactive wastes or isotopes of such half-life or concentration as may exceed limits established by the City in compliance with applicable State or Federal regulations.

l) Any wastewater which causes a hazard to human life or creates a public nuisance.

m) Stormwater, groundwater, rain water, street drainage, roof top drainage, basement drainage, sub-surface drainage, or yard drainage if unpolluted unless a storm sewer or other reasonable alternative for removal of such drainage does not exist, and then only when such discharge is permitted by the user's wastewater discharge permit and the appropriate fee is paid for the volume thereof.

n) No person shall discharge any substance directly into a manhole or other opening in a community sewer other than through an approved building sewer, unless he shall have been issued a temporary permit by the Director of Public Works. The Director of Public Works shall incorporate in such temporary permit those conditions he deems reasonably necessary to insure compliance with the provisions of this article and the user shall be required to pay applicable charges and fees.

o) No person owning vacuum or "cesspool" pump trucks or other liquid waste transport trucks shall discharge directly or indirectly such sewage into the City's wastewater collection and treatment facilities, unless such person shall first have applied for and received a Truck Discharge Operation Permit from the Director of Public Works. All applicants for a Truck Discharge Operation Permit shall complete such forms as required by the Director of Public Works, pay appropriate fees, and agree in writing to abide by the provisions of this article and any special conditions or regulations established by the Director of Public Works. The owners of such vehicles shall affix and display the permit number on the side of each vehicle used for such purposes. Such permits shall be valid for a period of one year from date of issuance, provided that such permit shall be subject to revocation by the Director of Public Works for violation of any provision of this article or reasonable regulation established by the Director of Public Works. Such permits shall be limited to the discharge of domestic sewage waste containing no industrial waste. The Director of Public Works shall designate the

locations and times where such trucks may be discharged, and may refuse to accept any truckload of waste in his absolute discretion where it appears that the waste could interfere with the effective operation of the treatment works or any sewer line or appurtenance thereto.

p) No person shall discharge any other holding tank waste into the City's wastewater collection and treatment facilities unless he shall have applied for and have been issued a permit by the Director of Public Works. Unless otherwise allowed under the terms and conditions of the permit, a separate permit must be secured for each separate discharge, the time of day the discharge is to occur, the volume of the discharge, and shall limit the wastewater constituents of the discharge. Such user shall pay any applicable charges or fees therefor, and shall comply with the conditions of the permit issued by the Director of Public Works. However, no permit will be required to discharge domestic waste from a recreational vehicle holding tank provided such discharge is made into an approved facility designed to receive such waste.

q) When the Director of Public Works determines that a user is contributing to the City's wastewater collection and treatment facilities, any of the above enumerated substances in such amounts as to interfere with the operation of the City's wastewater collection and treatment facilities, the Director of Public Works shall (1) Advise the user of the impact of the contribution of the City's wastewater collection and treatment system; and (2) develop discharge limitation(s) for such a user to correct the interference with the City's wastewater collection and treatment facilities.

r) Petroleum oil, non-biodegradable cutting oil or products of mineral oil origin in amounts that can pass through or cause interference.

s) No person shall access the City's wastewater collection and treatment facilities for any activity including discharge of hauled septic or industrial wastes except at locations and at times as designated by the Director of Public Works. Any removal of manhole lids, or other access to the sewer system for the purpose of discharging wastes at times and/or locations other than those designated by the Director of Public Works, or without the expressed permission of the Director of Public Works, shall be considered a violation and shall be subject to enforcement action including fines and penalties allowed under Section 7 of Sewer Use Ordinance 091-24.

J. COMPLIANCE WITH APPLICABLE PRETREATMENT STANDARDS AND REQUIREMENTS

Compliance with this permit does not relieve the permittee from its obligations regarding compliance with any and all applicable local, State and Federal pretreatment standards and requirements including any such standards or requirements that may become effective during the term of this permit.

K. COMPLIANCE SCHEDULES

The City may establish pretreatment requirements for the permittee as necessary, in order to maintain the level of treatment of other wastes, industrial and domestic, that are discharged to the collection and treatment facilities. In accordance with these requirements, the City may issue Compliance Schedules and applicable guidelines. The permittee, shall operate, in an efficient manner, on-site pretreatment facilities to achieve compliance with applicable pretreatment requirements.

While the permittee is meeting all deadlines to achieve compliance as set down in a Compliance Schedule or other Administrative Order, the City shall suspend the discharge limits for pollutants, covered by this schedule or order, in violation of permit limits while such schedule is in effect. In as much as such violations do not effect the operations of the wastewater treatment plant, cause it to violate its NPDES permit, or endanger the health and safety of the general public or treatment plant staff.

L. PERMITS TO INSTALL

All construction or modifications of facilities covered by this Discharge Permit, including existing or planned pretreatment units, must be conducted under a Ohio EPA approved Permit to Install (PTI).

SECTION 2 - OPERATION AND MAINTENANCE

A. MONITORING FACILITIES

Each user shall provide and operate at the user's expense, a monitoring facility to allow inspection, sampling and flow measurement of each sewer discharge to the City. Each monitoring facility shall be situated on the user's premises, except where such a location would be impractical or cause undue hardship on the user, the City may concur with the facility being constructed in the public street or sidewalk area providing that the facility is located so that it will not be obstructed by landscaping or parked vehicles. There shall be ample room in or near such sampling facility to allow accurate sampling and preparation of samples for analysis. The facility, sampling, and measuring equipment shall be maintained at all times in a safe and proper operating condition at the expense of the user.

All monitoring facilities shall be constructed and maintained in accordance with the applicable local construction standards and specifications.

B. ACCIDENTAL DISCHARGES

Each user shall provide protection from accidental discharge of prohibited materials or other substances regulated by these regulations. Facilities to prevent accidental discharge of prohibited materials shall be provided and maintained at the owner or user's own cost and expense. Detailed plans showing facilities and operating procedures to provide this protection shall be submitted to the City for review, and shall be approved by the City before construction of the facility. All existing users shall complete such a plan within 90 days from the effective date of these regulations. No user who commences contribution to the City's wastewater collection and treatment facilities after the effective date of these regulations shall be permitted to introduce pollutants into the system until accidental discharge procedures have been approved by the City. Review and approval of such plans and operating procedures shall not relieve the industrial user from the responsibility to modify the user's facility as necessary to meet the requirements of these Regulations. In the case of an accidental discharge (e.g., slugloads), it is the responsibility of the user to immediately telephone and notify the City's wastewater collection and treatment facility of the incident to enable countermeasures to be taken by the City to minimize damage to the treatment facility and its receiving waters.

A notice shall be permanently posted on the user's bulletin board or other prominent place advising employees whom to call in the event of an accidental discharge. Employers shall insure that all employees who may cause or suffer from such an accidental discharge are advised of the emergency notification procedure.

C. BYPASS

An industrial user may bypass all or part of its discharge past pretreatment units providing the discharge meets permit or local limits and is essential for maintenance of such units.

All other bypasses are prohibited except where they are to prevent loss of life, personal injury or severe property damage. With the consent of the City, bypasses, for which there is no favorable alternative action, may be allowed.

Whenever possible, industry shall notify the City at least 10 days prior to the anticipated date of bypass or; if such notice is impossible, within 24 hours after discovering a bypass is occurring. A written explanation of the cause of such emergency bypasses shall be delivered to the Director of Public Works, within five days of such emergency bypass. Such notification shall include steps to be taken to eliminate future occurrences.

D. UPSET

An upset condition shall be an affirmative defense for an industrial user where such upset causes the violation of a categorical pretreatment standard.

An industrial user must report to the City's wastewater collection and treatment facility by telephone that an upset is occurring within 24 hours of becoming aware that an upset exists. Within five days after an upset, the industrial user will provide a written report to the Director of Public Works, stating the probable cause of the upset, the exact date and time the upset occurred, the type and quantity of pollutant released and steps being taken to prevent such future violations. If the upset condition still exists, the industrial user will provide the earliest date to correct the upset and return to compliance.

If the treatment process at the City's wastewater treatment plant should be upset due to excessive discharge loadings from the user, the user shall assume all operational, legal and penalty costs incurred by the City as a result of such excessive discharge loadings.

SECTION 3 - MONITORING AND RECORDS

A. ADDITIONAL MONITORING BY THE PERMITTEE

If the results of periodic monitoring indicate non-compliance with any pollutant limit stipulated in the industrial users discharge permit, or where such limits or permits do not exist; monitoring results exceed federal categorical or local limits; then the industrial user shall notify the Director of Public Works, in writing within 24 hours of becoming aware of this non-conforming discharge. The industrial user must then repeat the sampling and analysis and submit the results to the City within 30 days, unless the City samples the industrial user's discharge. If this resampling indicates continued non-compliance, then the industrial user shall continue weekly sampling until such time that the results of two repeat samplings indicate a return to compliance status. Results of all such resampling must be received by the City within 30 days following such resampling.

Resampling, as described above, may also be ordered when the City, as a result of its own sampling efforts, discovers a violation of discharge limits. The City will notify the industrial user of a violation and provide a resampling schedule to the industry as part of this notification.

The resampling, as described in this paragraph, is not required of industry monitored on a daily basis by the City.

B. RIGHT OF ENTRY FOR INSPECTION, SAMPLING AND RECORDS

The City may inspect the monitoring facilities of any user to determine compliance with the requirement of this permit. The user shall allow the City or its representatives, upon presentation of credentials of identification, to enter upon the premises of the user at reasonable hours, for the purpose of inspection, sampling, or records examination. The City shall have the right to set up on the user's property such devices as are necessary to conduct sampling, inspection, compliance monitoring and/or metering operations.

C. RECORDS RETENTION

The significant industrial user who is subject to this permit shall retain and preserve for no less than three years, any records, books, documents, memoranda, reports, correspondence and any and all summaries thereof, relating to monitoring, sampling and chemical analysis made by or in behalf of a user in connection with its discharge. All records which pertain to matters which are subject of Administrative Adjustment or any other enforcement or litigation activities brought by the City pursuant hereto shall be retained and preserved by the user until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

D. RECORDS CONTENTS

Records of sampling and analysis shall include:

a) The date, exact place, time, and methods of sampling or measurements, and sample preservation techniques or procedures;
b) Who performed the sampling or measurements;
c) The date(s) analysis was performed;
d) Who performed the analysis;
e) The analytical techniques or methods used; and
f) The results of such analysis.

E. FALSIFYING INFORMATION

Any person who knowingly makes any false statement, representation or certification in any application, record, report, plan or other document filed or required to be maintained pursuant to this permit, or who falsifies or tampers with, or knowingly renders inaccurate any monitoring device or method required under Sewer Use Ordinance 091-24, shall upon conviction be punished by imposition of a civil penalty of not less than one thousand dollars or by imprisonment for not more than six months, or by both.

SECTION 4 - ADDITIONAL REPORTING REQUIREMENTS

A. All applications, reports or information submitted to the City of Middletown must contain the following certification statement and be signed as required in (a).

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

a) By a responsible corporate officer, if the industrial user submitting the reports is a corporation. For the purpose of this paragraph, a responsible corporate officer means:

(i) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation, or;

(ii) the manager of one or more manufacturing, production, or operation facilities employing more than 250 persons or having gross annual sales or expenditures exceeding $25 million, if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

B. ENFORCEMENT ACTIONS

The Director of Public Works shall publish, prior to March 31 of each year, a list of all industrial users, which at any time during the previous twelve months were in significant non-compliance with applicable pretreatment requirements. For the purposes of this provision, an industrial user is in significant non-compliance if its violations meet one or more of the following criteria:

(a) Chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent (66%) or more of all of the measurements taken during a six-month period exceed (by any magnitude) the daily maximum limit or the average limit for the same pollutant parameter;

(b) Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent (33%) or more of all of the measurements for each pollutant parameter taken during a six-month period equal or exceed the product of the daily maximum limit or the average limit multiplied by the applicable TRC (TRC = 1.4 for BOD, TSS, Fats, Oil and Grease, and 1.2 for all other pollutants except pH);

(c) Any other violation of a pretreatment effluent limit (daily maximum or longer term average) that the Director of Public Works determines has caused, alone or in combination with other discharges, interferences, or pass through (including endangering the health of the POTW personnel or the general public);

(d) Any discharge of a pollutant that has caused imminent endangerment of human health, welfare or to the environment or has resulted in the POTW's exercise of emergency authority to halt or prevent such a discharge;

(e) Failure to meet, within ninety days after the schedule date, a Compliance Schedule milestone contained in a Wastewater Discharge Permit or Enforcement Order for starting construction, completing construction, or attaining final compliance;

(f) Failure to provide, within thirty days after the due date, required reports such as Baseline Monitoring Reports, Ninety Day Compliance Reports, periodic Self-Monitoring Reports, and reports on compliance with Compliance Schedules;

(g) Failure to accurately report non-compliance;

(h) Any other violation or group of violations which the Director of Public Works determines will or has adversely affected the operation or implementation of the City's Pretreatment Program.

C. CIVIL PENALTIES

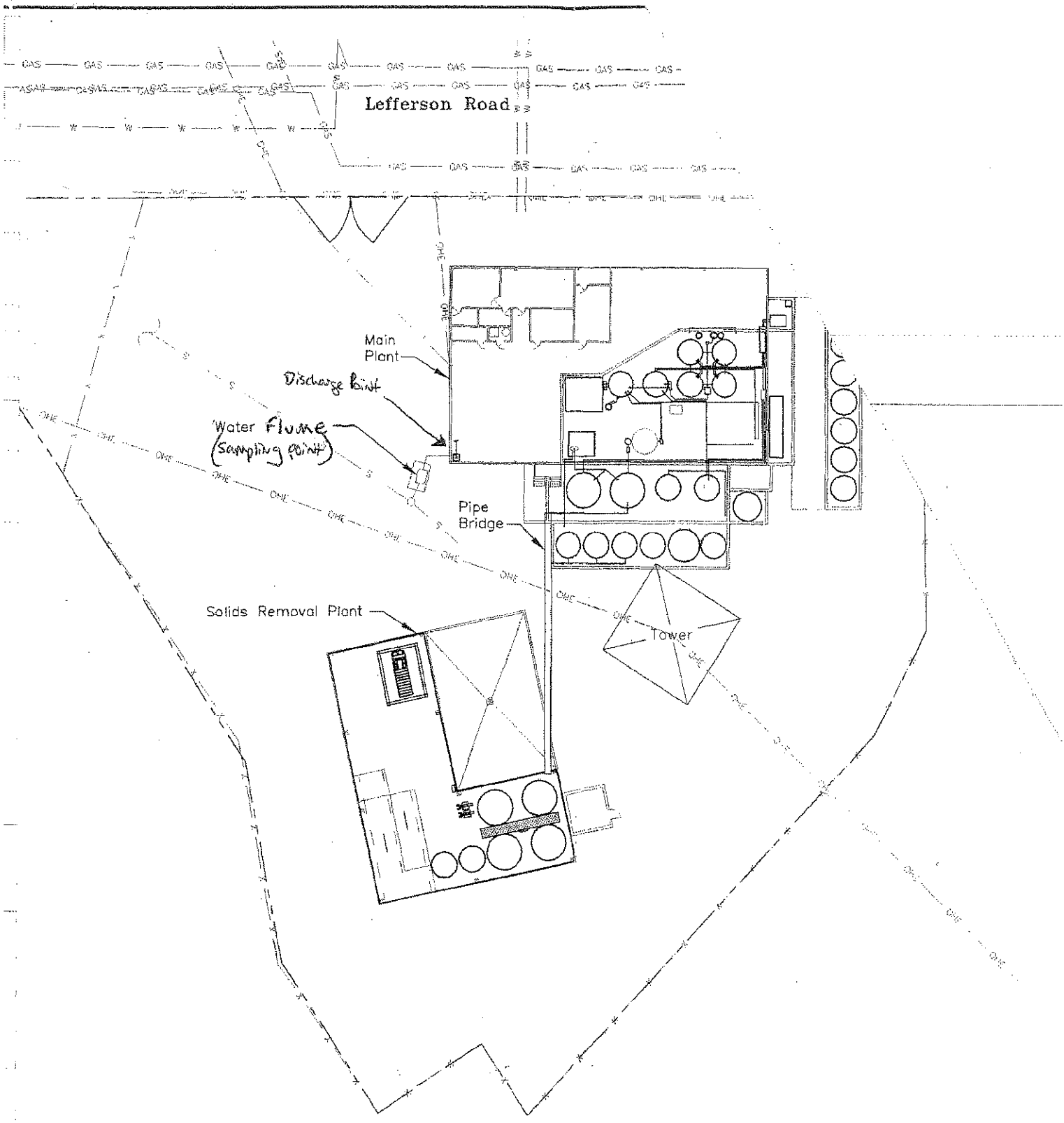
Any user who is found to have violated an order of the City Manager or who willfully or negligently failed to comply with any provision of these regulations, and the orders, rules, regulations, permits or previously administered orders issued hereunder, shall be assessed a monetary penalty of not more than ten thousand dollars per offense. Each day on which a violation shall occur or continue shall be deemed a separate and distinct offense. In addition to the penalties provided herein, the City may recover reasonable attorney's fees, court costs, court reporters' fees and other expenses of litigation by appropriate suit at law against the person found to have violated these regulations or the orders, rules, regulations, and permits issued hereunder.

D. RECOVERY COSTS DUE TO DAMAGES CAUSED BY THE USER

Every user shall be responsible for assuring that no discharge from any source originating within his jurisdiction shall be of such a nature as to cause obstruction, damage, or any other impairment of the City's wastewater collection and treatment facilities. Damages or expenses incurred by the City as a result of any violation of this section shall be levied on and collected from such a user.

Appendix A

Sampling Location


Lefferson Road
Main Plant
Discharge Point
Water Flume
(Sampling point)
Pipe Bridge
Solids Removal Plant
Tower

LEGEND

Appendix B

Self-Monitoring Report Form

CITY OF MIDDLETOWN PRETREATMENT PROGRAM
INDUSTRIAL USER SELF-MONITORING REPORT

Industry Identification:

Name: United Oil Recovery Services, Inc.

Permit No. 116-2012

Outfall No. 118-001

Monitoring Period:

January, February, March..... _____ (year)

April, May, June..... _____ (year)

July, August, September..... _____ (year)

October, November, December... _____ (year)

Parmeter															
Units															
Analytical Method [1]															
Sample Type [2]															
Analytical Results Sample Date															
Permit Limits															
Daily Max.															
Monthly Avg.															

[1] Indicate the analytical method used.

[2] Indicate sample type, whether grab (G) or composite (C)

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry or the person or persons who manage the system, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Date_____ **Signature**_____ **Title:** _____

Appendix C

24-hour Notice of Violation Form

MIDDLETOWN

SIGNIFICANT INDUSTRIAL USER
24 – HOUR NOTIFICATION OF VIOLATION OF DISCHARGE PERMIT LIMITATIONS

Facility Name: _____

Discharge Permit No.: _____

Date Reported to City: _____

Date Industry Became Aware of Violation: _____

Reported By: _____

Reported To: _____

PARAMETERS IN VIOLATION

Date	Parameter	Permit Limit	Result

Comments:

_____

_____

_____

Note: This form must be submitted within 24 hours of the industry becoming aware of the violation, regardless of the time elapsed since sample collection.

City Wastewater Treatment Plant Fax: 425-7964 ; phone: 425-7989

ATTACHMENT 9

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 CHICAGO REGIONAL LABORATORY

536 SOUTH CLARK STREET

CHICAGO, ILLINOIS 60605

LABORATORY ACCREDITATION BUREAU
ACCREDITED ISO/IEC 17025
Certificate # L2280 Testing

Date: 7/6/2011

Subject: Review of Region 5 Data for United Oil Recovery Services

From: Erlinda Evangelista
Region 5 Chicago Regional Laboratory

To: Office of Enforcement and Compliance Assurance
77 W. Jackson
Chicago, IL 60604

The data being transmitted under this cover memo successfully passed CRL's internal data review procedures as documented in our current Quality Management Plan (QMP) and appropriate Standard Operating Procedures (SOPs). Please be aware that CRL does not perform data validation which is based on your data quality objectives. This function must be performed independently of the laboratory generating the data.

Results in this report represent only the samples analyzed.

Please have the U.S. EPA Project Manager/Officer call the CRL Sample Coordinator at (312) 353-7444 for any comments or questions.

Attached are Results for: United Oil Recovery Services

_____ / / _____

Data Management Coordinator and Date Received

Date Transmitted: ____/____/_____

Analyses included in this report:

PCB (TSCA) PCB (TSCA)

Environmental Protection Agency Region 5
Chicago Regional Laboratory
536 South Clark Street, Chicago, IL 60605
Phone:(312)353-8370 Fax:(312)886-2591

LABORATORY ACCREDITATION BUREAU
ACCREDITED ISO/IEC 17025
Certificate # L2280 Testing

Office of Enforcement and Compliance Assurance	Project: United Oil Recovery Services	
77 W. Jackson	Project Number: EN0211	**Reported:**
Chicago IL, 60604	Project Manager: Paul Novak	Jul-06-11 15:58

ANALYSIS CASE NARRATIVE

Analyst Phone No: 312-353-4331

General Information

This project consisted of one water and three oil samples for PCB analysis by GC003 Rev. 7 (GC/ECD).

The water sample and associated QC samples were prepared by separatory funnel extraction. One additional aliquot of the sample was received and was processed as matrix spike sample. The samples were brown in color, somewhat oily, with suspended particles. Due to lack of sample, a MSD was not prepared. The data user was made aware of this situation.

The oil samples were multi-phasic, with suspended, powdery particles. Prior to obtaining the sample aliquot, the phases were allowed to separate; only the oil part was taken for the analysis. The solvent dilution method (GC012 Rev. 5) was followed in the preparation of these samples.

The extracts were subjected to Florisil cartridge cleanup (GC014 Rev. 3), acid cleanup (GC016 Rev. 2), and sulfur cleanup by copper treatment (GC019 Rev. 2).

All holding times were met.

Sample Analysis and Results

Preparation of Water Samples:
Addition of the extraction solvent (dichloromethane) to the water samples and subsequent shaking resulted in heavy precipitation which made it very difficult to separate the solvent from the aqueous phase. The only alternative was to filter through sodium sulfate. Concentration and solvent exchange to hexane resulted in a very viscous solution and hard gummy material.

Preparation of Oil samples:
The phases were allowed to separate prior to obtaining the oil sample for analysis. 2.5 g of the oil sample was weighed out and diluted to 25 ml with hexane instead of 1 g diluted to 10 ml as specified in the SOP in order to have sufficient extract for the extensive cleanup anticipated. The amount of surrogates and the spiking solutions for the QC samples were adjusted accordingly.

The extracts were subjected to extensive cleanup following the procedures mentioned earlier in this narrative.

Analysis:
Due to the presence of interferences not eliminated by the various cleanup procedures and the huge, unresolved "humps" eluting late in the chromatograms of both the water and oil extracts, dilutions were made in an attempt to

Office of Enforcement and Compliance Assurance	Project: United Oil Recovery Services	
77 W. Jackson	Project Number: EN0211	**Reported:**
Chicago IL, 60604	Project Manager: Paul Novak	Jul-06-11 15:58

bring the baseline down and/or resolve the "hump" to determine if PCBs could be present. The "humps" remained unresolved even though the baseline came down slightly. Therefore, the reporting limits had to be elevated based on the dilutions; reporting limits for the later eluting Aroclors (1254, 1260, 1262, and 1268) are higher than for the earlier eluting Aroclors (1221, 1016, 1232, 1242, and 1248).

There were no PCBs (as Aroclors) detected above the elevated reporting limits. All the results for the samples will be flagged as estimated (J) and biased low (L) due to the outliers mentioned in the QC section below. The outliers could be attributed to the presence of matrix interferences and losses during sample preparation and extensive cleanup.

Please see the LIMS report for the reporting limits.

Quality Control

Instrument Quality Controls:

All instrument controls met QC limits.

Method Quality Control:

1. Water QC samples:

Both TCMX and DCB were outside QC limits in the method blank and in MS1; DCB was outside QC limits in BS1.

Aroclors 1016 and 1260 recoveries in the matrix spike could not be calculated due to matrix interferences that persisted in spite of the extensive cleanup.

2. Oil QC samples:

TCMX recoveries were outside QC limits for BS1 and BSD1.

Aroclor 1016 recoveries in BS1 and BSD1 were outside QC limits.

Aroclors 1016 and 1260 recoveries in the MS/MSD could not be calculated due to matrix interferences that persisted in spite of the extensive cleanup.

3. Site samples:

All of the surrogates for the site samples exceeded the QC limits.

Environmental Protection Agency Region 5
Chicago Regional Laboratory
536 South Clark Street, Chicago, IL 60605
Phone:(312)353-8370 Fax:(312)886-2591

Office of Enforcement and Compliance Assurance	Project: United Oil Recovery Services	
77 W. Jackson	Project Number: EN0211	**Reported:**
Chicago IL, 60604	Project Manager: Paul Novak	Jul-06-11 15:58

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
S01	1105008-01	Oil	May-24-11 15:55	May-25-11 12:31
S02	1105008-02	Oil	May-24-11 15:58	May-25-11 12:31
S03	1105008-03	Water	May-24-11 16:02	May-25-11 12:31
S04	1105008-04	Oil	May-24-11 16:30	May-25-11 12:31

Environmental Protection Agency Region 5
Chicago Regional Laboratory
536 South Clark Street, Chicago, IL 60605
Phone:(312)353-8370 Fax:(312)886-2591

Office of Enforcement and Compliance Assurance	Project: United Oil Recovery Services	
77 W. Jackson	Project Number: EN0211	**Reported:**
Chicago IL, 60604	Project Manager: Paul Novak	Jul-06-11 15:58

PCB by GC/ECD, EPA 8082 A (modified)

US EPA Region 5 Chicago Regional Laboratory

S01 (1105008-01) Oil Sampled: May-24-11 15:55 Received: May-25-11 12:31

Analyte	Result	Flags / Qualifiers	MDL	Limit	Units	Dilution	Batch	Prepared	Analyzed
PCB-1016	U	J, L	4.86	9.73	ug/g	10	B106013	Jun-14-11	Jun-23-11
PCB-1221	U	J, L	4.86	9.73	"	"	"	"	"
PCB-1232	U	J, L	4.86	9.73	"	"	"	"	"
PCB-1242	U	J, L	4.86	9.73	"	"	"	"	"
PCB-1248	U	J, L	4.86	9.73	"	"	"	"	"
PCB-1254	U	J, L	48.6	97.3	"	100	"	"	Jun-21-11
PCB-1260	U	J, L	48.6	97.3	"	"	"	"	"
PCB-1262	U	J, L	48.6	97.3	"	"	"	"	"
PCB-1268	U	J, L	48.6	97.3	"	"	"	"	"
Surrogate: Tetrachloro-meta-xylene	0.00			*%*	*52-110*		"	"	*Jun-17-11*
Surrogate: Decachlorobiphenyl	0.00	MI		*%*	*52-110*		"	"	"

S02 (1105008-02) Oil Sampled: May-24-11 15:58 Received: May-25-11 12:31

Analyte	Result	Flags / Qualifiers	MDL	Limit	Units	Dilution	Batch	Prepared	Analyzed
PCB-1016	U	J, L	4.33	8.65	ug/g	10	B106013	Jun-14-11	Jun-23-11
PCB-1221	U	J, L	4.33	8.65	"	"	"	"	"
PCB-1232	U	J, L	4.33	8.65	"	"	"	"	"

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US EPA Region 5 Chicago Regional Laboratory

S02 (1105008-02) Oil Sampled: May-24-11 15:58 Received: May-25-11 12:31

Analyte	Result	Flags / Qualifiers	MDL	Limit	Units	Dilution	Batch	Prepared	Analyzed
PCB-1242	U	J, L	4.33	8.65	ug/g	10	B106013	Jun-14-11	Jun-23-11
PCB-1248	U	J, L	4.33	8.65	"	"	"	"	"
PCB-1254	U	J, L	43.3	86.5	"	100	"	"	Jun-21-11
PCB-1260	U	J, L	43.3	86.5	"	"	"	"	"
PCB-1262	U	J, L	43.3	86.5	"	"	"	"	"
PCB-1268	U	J, L	43.3	86.5	"	"	"	"	"
Surrogate: Tetrachloro-meta-xylene	0.225			*130 %*	*52-110*		"	"	*Jun-17-11*
Surrogate: Decachlorobiphenyl	0.00	MI		*%*	*52-110*		"	"	"

S03 (1105008-03) Water Sampled: May-24-11 16:02 Received: May-25-11 12:31

Analyte	Result	Flags / Qualifiers	MDL	Limit	Units	Dilution	Batch	Prepared	Analyzed
PCB-1016	U	J, L	0.500	1.00	ug/L	1	B105040	May-31-11	Jun-17-11
PCB-1221	U	J, L	0.500	1.00	"	"	"	"	"
PCB-1232	U	J, L	0.500	1.00	"	"	"	"	"
PCB-1242	U	J, L	0.500	1.00	"	"	"	"	"
PCB-1248	U	J, L	0.500	1.00	"	"	"	"	"
PCB-1254	U	J, L	0.500	1.00	"	"	"	"	"

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Office of Enforcement and Compliance Assurance	Project: United Oil Recovery Services	
77 W. Jackson	Project Number: EN0211	**Reported:**
Chicago IL, 60604	Project Manager: Paul Novak	Jul-06-11 15:58

PCB by GC/ECD, EPA 8082 A (modified)

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S03 (1105008-03) Water Sampled: May-24-11 16:02 Received: May-25-11 12:31

Analyte	Result	Flags / Qualifiers	MDL	Limit	Units	Dilution	Batch	Prepared	Analyzed
PCB-1260	U	J, L	25.0	50.0	ug/L	50	B105040	May-31-11	Jun-23-11
PCB-1262	U	J, L	25.0	50.0	"	"	"	"	"
PCB-1268	U	J, L	25.0	50.0	"	"	"	"	"
Surrogate: Tetrachloro-meta-xylene	2.00E-2			*10.0 %*	*50-150*		"	"	*Jun-17-11*
Surrogate: Decachlorobiphenyl	0.00	MI		*%*	*50-150*		"	"	"

S04 (1105008-04) Oil Sampled: May-24-11 16:30 Received: May-25-11 12:31

Analyte	Result	Flags / Qualifiers	MDL	Limit	Units	Dilution	Batch	Prepared	Analyzed
PCB-1016	U	J, L	4.72	9.43	ug/g	10	B106013	Jun-14-11	Jun-23-11
PCB-1221	U	J, L	4.72	9.43	"	"	"	"	"
PCB-1232	U	J, L	4.72	9.43	"	"	"	"	"
PCB-1242	U	J, L	4.72	9.43	"	"	"	"	"
PCB-1248	U	J, L	4.72	9.43	"	"	"	"	"
PCB-1254	U	J, L	47.2	94.3	"	100	"	"	Jun-21-11
PCB-1260	U	J, L	47.2	94.3	"	"	"	"	"
PCB-1262	U	J, L	47.2	94.3	"	"	"	"	"
PCB-1268	U	J, L	47.2	94.3	"	"	"	"	"

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S04 (1105008-04) Oil Sampled: May-24-11 16:30 Received: May-25-11 12:31

Analyte	Result	Flags / Qualifiers	MDL	Limit	Units	Dilution	Batch	Prepared	Analyzed
Surrogate: Tetrachloro-meta-xylene	0.113			*60.0*	*%*	*52-110*	*B106013*	*Jun-14-11*	*Jun-17-11*
Surrogate: Decachlorobiphenyl	0.00	MI		*%*		*52-110*	"	"	"

Erlinda Evangelista, Group Leader

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Office of Enforcement and Compliance Assurance	Project: United Oil Recovery Services	
77 W. Jackson	Project Number: EN0211	**Reported:**
Chicago IL, 60604	Project Manager: Paul Novak	Jul-06-11 15:58

PCB by GC/ECD, EPA 8082 A (modified) - Quality Control
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Batch B105040 - EPA 3510B

Blank (B105040-BLK1) **Prepared: May-31-11 Analyzed: Jun-17-11**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
PCB-1016	**U**		0.500	1.00	ug/L						
PCB-1221	**U**		0.500	1.00	"						
PCB-1232	**U**		0.500	1.00	"						
PCB-1242	**U**		0.500	1.00	"						
PCB-1248	**U**		0.500	1.00	"						
PCB-1254	**U**		0.500	1.00	"						
PCB-1260	**U**		0.500	1.00	"						
PCB-1262	**U**		0.500	1.00	"						
PCB-1268	**U**		0.500	1.00	"						
Surrogate: Tetrachloro-meta-xylene	*8.00E-2*				"	*2.000E-1*		*40.0*	*50-150*		
Surrogate: Decachlorobiphenyl	*9.00E-2*				"	*2.000E-1*		*45.0*	*50-150*		

LCS (B105040-BS1) **Prepared: May-31-11 Analyzed: Jun-17-11**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
PCB-1016	**8.10**		0.500	1.00	ug/L	10.00		81.0	70-130		
PCB-1260	**7.02**		0.500	1.00	"	10.00		70.2	70-130		
Surrogate: Tetrachloro-meta-xylene	*0.110*				"	*2.000E-1*		*55.0*	*50-150*		
Surrogate: Decachlorobiphenyl	*9.00E-2*				"	*2.000E-1*		*45.0*	*50-150*		

LCS (B105040-BS2) **Prepared: May-31-11 Analyzed: Jun-17-11**

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Office of Enforcement and Compliance Assurance	Project: United Oil Recovery Services	
77 W. Jackson	Project Number: EN0211	**Reported:**
Chicago IL, 60604	Project Manager: Paul Novak	Jul-06-11 15:58

PCB by GC/ECD, EPA 8082 A (modified) - Quality Control
US EPA Region 5 Chicago Regional Laboratory

Batch B105040 - EPA 3510B

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
PCB-1016	**7.50**		0.500	1.00	ug/L	10.00		75.0	70-130		
PCB-1260	**7.84**		0.500	1.00	"	10.00		78.4	70-130		
Surrogate: Tetrachloro-meta-xylene	*0.100*				"	*2.000E-1*		*50.0*	*50-150*		
Surrogate: Decachlorobiphenyl	*0.150*				"	*2.000E-1*		*75.0*	*50-150*		

LCS Dup (B105040-BSD1) **Prepared: May-31-11 Analyzed: Jun-17-11**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
PCB-1016	**8.13**		0.500	1.00	ug/L	10.00		81.3	70-130	0.370	30
PCB-1260	**8.39**		0.500	1.00	"	10.00		83.9	70-130	17.8	30
Surrogate: Tetrachloro-meta-xylene	*0.110*				"	*2.000E-1*		*55.0*	*50-150*		
Surrogate: Decachlorobiphenyl	*0.150*				"	*2.000E-1*		*75.0*	*50-150*		

Matrix Spike (B105040-MS1) **Source: 1105008-03** **Prepared: May-31-11 Analyzed: Jun-17-11**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
PCB-1016	U	MI	0.500	1.00	ug/L	10.00	U		50-150		
PCB-1260	U	MI	0.500	1.00	"	10.00	U		50-150		
Surrogate: Tetrachloro-meta-xylene	*4.00E-2*				"	*2.000E-1*		*20.0*	*50-150*		
Surrogate: Decachlorobiphenyl	*0.00*	MI			"	*2.000E-1*			*50-150*		

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Chicago IL, 60604	Project Manager: Paul Novak	Jul-06-11 15:58

PCB by GC/ECD, EPA 8082 A (modified) - Quality Control
US EPA Region 5 Chicago Regional Laboratory

Batch B105040 - EPA 3510B

Matrix Spike (B105040-MS1) **Source: 1105008-03** **Prepared: May-31-11 Analyzed: Jun-17-11**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit

Batch B106013 - EPA 3580A

Blank (B106013-BLK1) **Prepared: Jun-14-11 Analyzed: Jun-17-11**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
PCB-1016	U		1.25	2.50	ug/g						
PCB-1221	U		1.25	2.50	"						
PCB-1232	U		1.25	2.50	"						
PCB-1242	U		1.25	2.50	"						
PCB-1248	U		1.25	2.50	"						
PCB-1254	U		1.25	2.50	"						
PCB-1260	U		1.25	2.50	"						
PCB-1262	U		1.25	2.50	"						
PCB-1268	U		1.25	2.50	"						
Surrogate: Tetrachloro-meta-xylene	*0.400*				"	*5.000E-1*		*80.0*	*52-110*		
Surrogate: Decachlorobiphenyl	*0.400*				"	*5.000E-1*		*80.0*	*52-110*		

LCS (B106013-BS1) **Prepared: Jun-14-11 Analyzed: Jun-17-11**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
PCB-1016	**16.3**		1.25	2.50	ug/g	25.00		65.3	70-130		

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77 W. Jackson	Project Number: EN0211	**Reported:**
Chicago IL, 60604	Project Manager: Paul Novak	Jul-06-11 15:58

PCB by GC/ECD, EPA 8082 A (modified) - Quality Control
US EPA Region 5 Chicago Regional Laboratory

Batch B106013 - EPA 3580A

LCS (B106013-BS1) **Prepared: Jun-14-11 Analyzed: Jun-17-11**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
PCB-1260	**20.1**		1.25	2.50	ug/g	25.00		80.5	70-130		
Surrogate: Tetrachloro-meta-xylene	*0.200*				"	*5.000E-1*		*40.0*	*52-110*		
Surrogate: Decachlorobiphenyl	*0.450*				"	*5.000E-1*		*90.0*	*52-110*		

LCS Dup (B106013-BSD1) **Prepared: Jun-14-11 Analyzed: Jun-17-11**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
PCB-1016	**14.0**		1.25	2.50	ug/g	25.00		55.8	70-130	15.7	30
PCB-1260	**20.9**		1.25	2.50	"	25.00		83.6	70-130	3.78	30
Surrogate: Tetrachloro-meta-xylene	*7.50E-2*				"	*5.000E-1*		*15.0*	*52-110*		
Surrogate: Decachlorobiphenyl	*0.450*				"	*5.000E-1*		*90.0*	*52-110*		

Matrix Spike (B106013-MS1) **Source: 1105008-04** **Prepared: Jun-14-11 Analyzed: Jun-17-11**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
PCB-1016	U	MI	0.460	0.919	ug/g	9.191	U		50-150		
PCB-1260	U	MI	0.460	0.919	"	9.191	U		50-150		
Surrogate: Tetrachloro-meta-xylene	*0.00*				"	*1.838E-1*			*52-110*		
Surrogate: Decachlorobiphenyl	*0.00*	MI			"	*1.838E-1*			*52-110*		

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PCB by GC/ECD, EPA 8082 A (modified) - Quality Control
US EPA Region 5 Chicago Regional Laboratory

Batch B106013 - EPA 3580A

Matrix Spike (B106013-MS1) **Source: 1105008-04** **Prepared: Jun-14-11 Analyzed: Jun-17-11**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit

Matrix Spike Dup (B106013-MSD1) **Source: 1105008-04** **Prepared: Jun-14-11 Analyzed: Jun-17-11**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
PCB-1016	**U**	MI	0.475	0.951	ug/g	9.506	U		50-150		30
PCB-1260	**U**	MI	0.475	0.951	"	9.506	U		50-150		30
Surrogate: Tetrachloro-meta-xylene	*0.00*				"	*1.901E-1*			*52-110*		
Surrogate: Decachlorobiphenyl	*0.00*				"	*1.901E-1*			*52-110*		

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Notes and Definitions

MI	Matrix Interferences
L	The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
J	The identification of the analyte is acceptable; the reported value is an estimate.
U	Not Detected
NR	Not Reported

Items for Project Manager Review

LabNumber	Analysis	Analyte	Exception
			Default Report (not modified)
			VERSION 6.08:2012
	PCB (TSCA)	(Oil)	J-Flags used
	PCB (TSCA)	(Oil)	Result calculations based on MDL
	PCB (TSCA)	(Oil)	Special Units: (ug/g)
	PCB (TSCA)	(Water)	J-Flags used
	PCB (TSCA)	(Water)	Result calculations based on MDL
	PCB (TSCA)	(Water)	Special Units: (ug/L)
1105008-01	PCB (TSCA)	Decachlorobiphenyl	MI: Matrix Interferences
1105008-01	PCB (TSCA)	PCB-1016	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-01	PCB (TSCA)	PCB-1221	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-01	PCB (TSCA)	PCB-1232	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-01	PCB (TSCA)	PCB-1242	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-01	PCB (TSCA)	PCB-1248	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-01	PCB (TSCA)	PCB-1254	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-01	PCB (TSCA)	PCB-1260	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-01	PCB (TSCA)	PCB-1262	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-01	PCB (TSCA)	PCB-1268	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-02	PCB (TSCA)	Decachlorobiphenyl	MI: Matrix Interferences
1105008-02	PCB (TSCA)	PCB-1016	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-02	PCB (TSCA)	PCB-1221	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-02	PCB (TSCA)	PCB-1232	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-02	PCB (TSCA)	PCB-1242	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-02	PCB (TSCA)	PCB-1248	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-02	PCB (TSCA)	PCB-1254	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-02	PCB (TSCA)	PCB-1260	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.

Items for Project Manager Review

LabNumber	Analysis	Analyte	Exception
1105008-02	PCB (TSCA)	PCB-1262	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-02	PCB (TSCA)	PCB-1268	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-02	PCB (TSCA)	Tetrachloro-meta-xylene	Exceeds upper control limit
1105008-03	PCB (TSCA)	Decachlorobiphenyl	MI: Matrix Interferences
1105008-03	PCB (TSCA)	PCB-1016	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-03	PCB (TSCA)	PCB-1221	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-03	PCB (TSCA)	PCB-1232	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-03	PCB (TSCA)	PCB-1242	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-03	PCB (TSCA)	PCB-1248	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-03	PCB (TSCA)	PCB-1254	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-03	PCB (TSCA)	PCB-1260	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-03	PCB (TSCA)	PCB-1262	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-03	PCB (TSCA)	PCB-1268	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-03	PCB (TSCA)	Tetrachloro-meta-xylene	Exceeds lower control limit
1105008-04	PCB (TSCA)	Decachlorobiphenyl	MI: Matrix Interferences
1105008-04	PCB (TSCA)	PCB-1016	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-04	PCB (TSCA)	PCB-1221	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-04	PCB (TSCA)	PCB-1232	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-04	PCB (TSCA)	PCB-1242	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-04	PCB (TSCA)	PCB-1248	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-04	PCB (TSCA)	PCB-1254	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-04	PCB (TSCA)	PCB-1260	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
1105008-04	PCB (TSCA)	PCB-1262	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.

Items for Project Manager Review

LabNumber	Analysis	Analyte	Exception
1105008-04	PCB (TSCA)	PCB-1268	L: The identification of the analyte is acceptable; the reported value may be biased low. The actual value is expected to be greater than the reported value.
B105040-BLK1	PCB (TSCA)	Decachlorobiphenyl	Exceeds lower control limit
B105040-BLK1	PCB (TSCA)	Tetrachloro-meta-xylene	Exceeds lower control limit
B105040-BS1	PCB (TSCA)	Decachlorobiphenyl	Exceeds lower control limit
B105040-MS1	PCB (TSCA)	Decachlorobiphenyl	MI: Matrix Interferences
B105040-MS1	PCB (TSCA)	PCB-1016	MI: Matrix Interferences
B105040-MS1	PCB (TSCA)	PCB-1016	Spike recovery below MDL
B105040-MS1	PCB (TSCA)	PCB-1260	MI: Matrix Interferences
B105040-MS1	PCB (TSCA)	PCB-1260	Spike recovery below MDL
B105040-MS1	PCB (TSCA)	Tetrachloro-meta-xylene	Exceeds lower control limit
B106013-BS1	PCB (TSCA)	PCB-1016	Exceeds lower control limit
B106013-BS1	PCB (TSCA)	Tetrachloro-meta-xylene	Exceeds lower control limit
B106013-BSD1	PCB (TSCA)	PCB-1016	Exceeds lower control limit
B106013-BSD1	PCB (TSCA)	Tetrachloro-meta-xylene	Exceeds lower control limit
B106013-MS1	PCB (TSCA)	Decachlorobiphenyl	MI: Matrix Interferences
B106013-MS1	PCB (TSCA)	PCB-1016	MI: Matrix Interferences
B106013-MS1	PCB (TSCA)	PCB-1016	Spike recovery below MDL
B106013-MS1	PCB (TSCA)	PCB-1260	MI: Matrix Interferences
B106013-MS1	PCB (TSCA)	PCB-1260	Spike recovery below MDL
B106013-MSD1	PCB (TSCA)	PCB-1016	MI: Matrix Interferences
B106013-MSD1	PCB (TSCA)	PCB-1016	Spike recovery below MDL
B106013-MSD1	PCB (TSCA)	PCB-1260	MI: Matrix Interferences
B106013-MSD1	PCB (TSCA)	PCB-1260	Spike recovery below MDL

Sample, Log and Extraction Comments

1105008-03
PCB (TSCA)

pH = 6
pH = 6

ATTACHMENT 10

FY 2011 MANUAL INSPECTION CONCLUSION DATA (ICDS) FORM

(Instructions and definitions for completing the information follow)

1. **Region**: 5 **Facility Name/Location**: United Oil Recovery Services
2640 Lefferson Road, Middletown, Ohio 45044

2. **General Facility Permit ID or Media-Specific Permit ID number (e.g. NPDES permit #):**
RCRA ID # OHO000107649

3. **SIC (4-digit):** 4953 **or** **NAICS Code (5-digit):**

4. **Date of Inspection**: 05/24/2011 (mm/dd/yyyy)

5. **Media Type** (check one only)
☐CAA-Stationary ☐CWA-NPDES ☐GLP ☐TSCA Lead Paint ☐CAA-Mobile Source
☐CAA-112(r) ☐RCRA Hazardous Waste ☐UST ☒TSCA core, PCBs, asbestos
☐CWA-Pretreatment (IU) ☐CWA 311 SPCC ☐CWA 404 Wetland ☐EPCRA 313
☐EPCRA non-313 ☐FIFRA

6. **Deficiencies:** Did you observe deficiencies during inspection? ☒Yes ☐No *[N/A is not allowed]*
a. If YES, go to #7
b. If NO, go to #9

7. **If YES:** Did you communicate the deficiencies to the facility during the inspection? ☒Yes ☐No

8. **Actions Taken:** Did you observe the facility take any actions during the inspection to address the deficiencies communicated? ☐Yes ☒No *[N/A is not allowed]*
a. If NO, go to #9
b. If YES, check the action(s) taken, or describe any other actions taken. (Check all that apply)

Action(s) Taken
_____ Verified compliance with previously issued enforcement action – part of all conditions
_____ Corrected recordkeeping deficiencies
_____ Corrected monitoring deficiencies
_____ Completed a notification or a report
_____ Requested a permit application
_____ Implemented new or improved management practices or processes
_____ Improved pollutant identification (e.g. labeling, manifesting, storage, etc.)
_____ Reduced pollution (e.g. use reduction, industrial process change, emissions or discharge change etc.) *Specify the pollutant(s) reduced only if this action is checked.*

Water: ☐Ammonia ☐BOD ☐COD ☐TSS ☐O/G ☐TC ☐DO ☐Metals ☐CN
Air: ☐NO_x ☐SO_2 ☐PM ☐VOC ☐Metals ☐HAPs ☐CO
List other observed or other pollutants reduced: _____

9. **Assistance:** Did you provide *general* assistance based on national policy? ☒Yes ☐No
Did you provide *site-specific* assistance based on national policy? ☒Yes ☐No
Note: EPA inspectors are **not** required to provide compliance assistance.

Optional Information: Describe actions taken or assistance provided to assist facility.
_____

NOTE TO EPA INSPECTORS

- The main purpose of EPA inspections/evaluations is to determine compliance with environmental regulations and enforcement agreements. Secondary purposes include providing a field presence to create a credible deterrent and providing assistance, when appropriate, to help facilities achieve compliance.
- The ICDS is used to identify observable corrections to deficiencies and compliance assistance activities. ICDS is **NOT** designed to capture all of the observations, findings, and other data contained in the final inspection report. Deficiencies identified as potential violations, and actions to address deficiencies noted on the ICDS must be included in the final EPA inspection report.
- ICDS information will be used to collect accomplishments of EPA's national inspection efforts, develop inspection outcomes for GPRA, and manage national compliance monitoring resources.
- The information will **NOT** be used to track individual EPA inspectors' performance.
- The ICDS should only be used for EPA-led inspections, not for state oversight inspections.

Instructions for Each Question

1. Region, Facility Name/Location: Enter the Region, and facility name/location (for unpermitted facilities).
2. Permit ID#: Enter either the Facility Registration System (FRS) permit ID or media-specific ID # (e.g., NPDES, CAA, or RCRA permit number).
3. SIC/NAICS Codes: Identify the SIC or NAICS code at (http://www.commerce.gov), (http://www.osha.gov/oshstats/sicser.html), (http://www.census.gov/epcd/www/naics.html), by CD-ROM (PB98-502024- NTIS (800-553-6847), or OC Inspector Website (http://intranet.epa.gov/oeca/inspector)
4. Date of Inspection: Enter the beginning date of the inspection (e.g., 04/10/2004)
5. Media Type: Check the environmental media program inspection being conducted.
6. Deficiencies: Check YES or NO. EPA inspectors should follow the regional policy on when and how to inform facilities of deficiencies. Deficiencies are defined as potential violations. Deficiencies are **NOT** compliance determinations (further review is needed to determine violations). A list of potential deficiencies is on the ICIS compliance monitoring screen (https://caribou.rtpnc.epa.gov/ICIS/).
7. Communication: Check YES or NO. N/A is not allowed.
8. Actions Taken: Check YES or NO. If YES, check only action(s) actually observed/seen, or write in a short description of the action in the "Other" section. These are **NOT** compliance determinations. Check the box to specify the pollutant: *Ammonia (NH3-N)* – ammonia nitrogen, ammonia as N, *BOD* – Biochemical Oxygen Demand, *COD* – Chemical Oxygen Demand, *TC* – Total Coliform, *TSS* – Total Suspended Solids, *SS* – Settleable Solids, *O/G* – Oil and Grease, *DO* – Dissolved Oxygen, NO_x – Nitrogen Oxides, SO_2 – Sulphur Dioxide, *PM* – Particulate Matter, *VOC* – Volatile Organic Compound, *CN* – Cyanide, *HAPs* – Hazardous Air Pollutants, *CO* – Carbon Monoxide, *Metals* – Hexavalent Chromium, Lead, Mercury, etc. Write in other pollutants if not listed. The Case Conclusion Data Sheet Training Booklet [November 2000] provides additional information on actions taken. The Training Booklet can be obtained by calling the Office of Compliance (202-564-6004).
9. Compliance Assistance: Inspectors are **not required** to provide compliance assistance during inspections. Check YES or NO to the two questions. General compliance assistance involves distributing prepared information on regulatory compliance, P2 or other written materials/websites. Refer to National Policy: Role of the EPA Inspector in Providing Compliance Assistance During Inspections, June 2003 for more information for examples of site-specific assistance. The policy is available on the EPA website (www.epa.gov), the Inspector Website (http://intranet.epa.gov/oeca/inspector), or calling (202-564-2300).

Data Collection Process

- Inspectors must complete the ICDS **immediately** after the inspection is conducted.
  Inspector should forward completed forms to first-line supervisor/designated alternate within five (5) days after returning from either a single inspection, or a series of inspections.
- The first-line supervisor/designated alternate must review the ICDS for completeness and accuracy and compile the ICDS information by media program to report ICDS results using the consolidated manual reporting form. The consolidated manual reporting form will be sent to HQ for **mid-year 2005 & end-of-year 2005 reporting**.